G 82/3 Final

NEWARK PUBLIC LIBRARY

NOV 12 1982

U. S. GOVT. PUBS.
DEPOSITORY 376

FINAL

ENVIRONMENTAL IMPACT STATEMENT

GREEN MOUNTAIN GRAZING

I 1.98:

IN REPLY REFER TO

United States Department of the Interior

1792-GM-EIS

BUREAU OF LAND MANAGEMENT
State Office
P.O. Box 1828
Cheyenne, Wyoming 82001

NOTICE

Enclosed for your information is the Final Green Mountain Grazing Environmental Impact Statement.

The Bureau of Land Management (BLM) proposes to allow livestock grazing on approximately 1,193,184 acres of public land in the BLM Lander Resource Area, Rawlins District, Wyoming. The Proposed Action is to manage grazing allotments at different levels of intensity to maintain present satisfactory conditions, improve present conditions, or prevent deterioration of present conditions. Proposed actions include changing grazing treatments and seasons of use, making adjustments in use levels, and providing additional grazing management facilities and land treatments. In this environmental impact statement (EIS), four alternatives (Elimination of Livestock Grazing, Enhanced Livestock Grazing, No Action, and Management Based on Currently Available Forage Data) are analyzed along with the Proposed Action. The affected environment is described, and the environmental consequences of the Proposed Action and alternatives are discussed.

The vegetation production data displayed and used in this EIS was collected during the 1979 field season, using accepted Bureau methods. This data was needed to help determine areas suitable for the rangeland management program and management alternatives. The vegetation production data has also been used to identify and analyze impacts and mitigation of the Proposed Action and alternatives. Reviewers of this EIS, however, should recognize the limitations of vegetation inventory data. While the data is adequate for purposes of planning and analysis, it must be supported by the results of monitoring studies before making forage allocation decisions.

The final EIS has been printed in an abbreviated format consistent with the National Environmental Policy Act Regulations. This document should be used in conjunction with the Green Mountain Draft EIS, which is still available. Requests for copies should be sent to: Rawlins District, Attention: EIS Team Leader, Bureau of Land Management, P.O. Box 670, Rawlins, WY 82301.

This final document consists of a summary of the impacts, text changes for each chapter, an expanded list of public participation, and a public comments and responses section. Changes and modifications are based on public input. Comments received after the comment period will be considered in the decisionmaking process.

We extend our thanks to those individuals and organizations who provided suggestions and comments on the draft. Your help has been invaluable in the preparation of the final EIS and will assist us to more effectively manage the public lands.

Sincerely yours,

Maxwell T. Lieurance

Maxwell T. Lieurance
State Director

Enclosure

FINAL

ENVIRONMENTAL IMPACT STATEMENT

PROPOSED GRAZING MANAGEMENT PROGRAM FOR THE GREEN MOUNTAIN EIS AREA

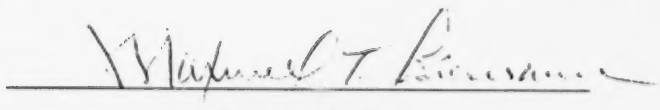
CARBON, FREMONT, NATRONA, AND SWEETWATER COUNTIES, WYOMING

Prepared By:

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

RAWLINS DISTRICT



STATE DIRECTOR

WYOMING STATE OFFICE

1982

PREFACE

The Final Green Mountain Grazing EIS has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations. This Final EIS must be used in combination with the Draft EIS. The Final EIS includes a summary of the Draft EIS, written comments received during the public review process and the responses to these comments, and a list of text changes.

SUMMARY

This EIS is an analysis of the effects of proposed and alternative livestock grazing management on approximately 1,193,184 acres of public land administered by the BLM Rawlins District in Wyoming. This document will be used to determine future grazing management, based on the principles of multiple use and sustained yield.

AREAS OF CONCERN AND CONTROVERSY

Prior to preparation of the EIS, a scoping process was conducted to identify significant issues. Based on contacts with organizations, individuals, and federal, state, and local agencies, areas of concern and controversy were identified.

Of considerable concern was competition for forage among livestock, wild horses, and wildlife. Apprehensions were expressed about adjustments in livestock numbers based on the forage allocation process. Categorization of allotments into I, M, and C categories concerned some people. Solutions to overuse of the range through changes in seasons-of-use, fences, water developments, sagebrush control, and soil erosion control were discussed. Trespass by livestock and removal of wild horses were issues also. Road improvement was considered important. Another concern was the preservation of historical objects. Land being taken out of forage production because of other uses worried some people. Conflicts between ranchers and the general public (trespassing, littering, gates left open, access to public lands, etc.) were an additional concern. These issues have been considered in the development of the Proposed Action and alternatives and in the analysis of the environmental consequences of these actions.

PROPOSED ACTION AND ALTERNATIVES

Proposed Action

In the rangeland management section of the Green Mountain Management Framework Plan (MFP), the grazing allotments are grouped into categories, and for each category recommendations are made for: an intensity of grazing management, including specific multiple-use resource management objectives; range improvement and monitoring needs; and actions needed to improve and maintain rangeland condition and productivity. Tradeoffs considered in arriving at the recommendations are identified in the analysis found in the MFP. Under the Proposed Action, present management would continue until monitoring results were available. Management actions based on all available data would then be implemented.

Elimination of Livestock Grazing

Under this alternative, livestock grazing would be eliminated from the public lands in the Green Mountain EIS area, and the lands would be managed for other resource values. Damage to watersheds would decrease in most allotments. Wild horse populations would be allowed to increase, and all managed wildlife species would be allowed to increase to population levels identified in the Wyoming Game and Fish Department's Strategic Plan for the Comprehensive Management of Wildlife in Wyoming.

Enhanced Livestock Grazing

Under this alternative, forage available for domestic livestock use would be increased through an accelerated program of range improvements. Suitable allotments would be placed under allotment management plans (AMPs), and livestock would have priority in forage allowances.

No Action

Under this alternative, the existing range management program would be frozen. There would be no new range improvement projects, but maintenance of existing improvements would be allowed. Livestock management actions such as changes in seasons of use, class of livestock, etc., would not be allowed, regardless of need. Wild horse and wildlife numbers would be maintained at current levels through wild horse gathering operations and coordination with the Wyoming Game and Fish Department.

Management Based on Currently Available Forage Data

Under this alternative, currently available forage data would be used, in lieu of monitoring, to establish grazing capacities. Maintenance and construction of range improvements would continue as planned. Plans for livestock and wild horse adjustments would begin immediately. Other management actions would be the same as for the Proposed Action.

Preferred Alternative

The Proposed Action is the preferred alternative.

TIME SCHEDULE FOR RANGE MANAGEMENT ACTIVITIES

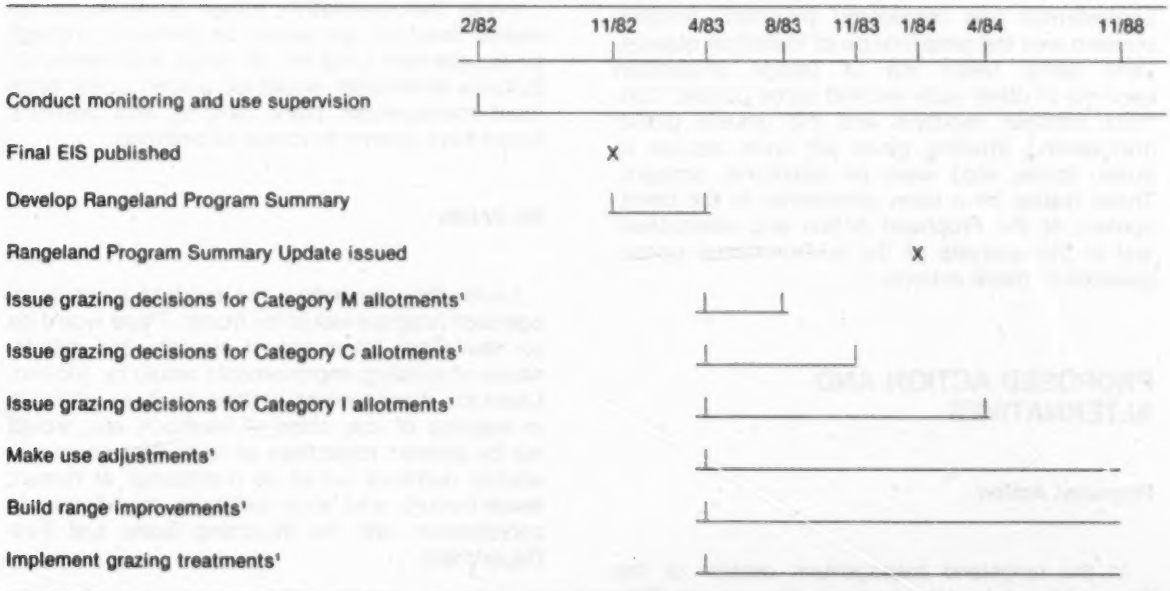
Figure S-1 is a time schedule for various range management activities and proposed activities discussed in this document.

LONG-TERM ENVIRONMENTAL CONSEQUENCES

In Table S-1, the projected long-term environmental consequences of the Proposed Action and alternatives are compared. The information summarized in this table provides a basis for choice among the options for the decisionmaker and the public. For more detailed descriptions of the projected consequences of the Proposed Action and alternatives, refer to Chapter 3, Environmental Consequences.

FIGURE S-1

TIME SCHEDULE FOR RANGE MANAGEMENT ACTIVITIES



¹Not applicable to the Elimination of Livestock Grazing and No Action alternatives.

TABLE S-1

COMPARATIVE SUMMARY OF PROJECTED LONG-TERM[1] ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION AND ALTERNATIVES

[0's indicated baseline data or no change, + 's indicate degree of increase, – 's indicate degrees of decrease][2]

Resource	Present Situation	Proposed Action	Elimination of Livestock Grazing	Enhanced Livestock Grazing	No Action	Management Based on Currently Available Forage Data
Soil stability						
Best case	0	+ + +	+ +	+	0	+ + +
Worst case	0	0	+	–	–	0
Water (Quality/Quantity)	0	+ + +	+ +	0	0	+
Vegetation						
Production	0	+ + +	+ + +	+	–	+ + +
Condition	0	+ +	+ + +	–	–	+ +
Socioeconomics/Livestock Grazing						
Direct impacts						
Net revenues	$43,901	+	– –	+	–	+
Indirect impacts						
Employment	1,164	+	– –	+	–	+
Regional income	$466,025,000	+	– –	+	–	+
Related impacts	0	0	+ +	– –	0	0
Social impacts	0	0	– –	0	0	0
Wildlife						
Nongame	0	+ +	+ + +	– – –	–	+ +
Small game	0	+ +	+ + +	– –	–	+ +
Big Game						
Elk	0	+ +	+ + +	– – –	–	+ +
Mule deer	0	+ +	+ + +	– – –	–	+ +
Antelope	0	+ +	+ + +	– – –	–	+ +
Moose	0	+ +	+ + +	– – –	–	+ +
Bighorn sheep	0	+ +	+ + +	– – –	–	+ +
Game birds	0	+ +	+ + +	– – –	–	+ +
Wild horses	19,952 AUMs	+	+	–	0	– – –
Fisheries						
Best case	0	+ +	+ + +	+	0	+
Worst case	0	+	+ + +	–	0	0
Cultural resources	0	+	+ + +	– – –	–	+
Visual resources	0	–	+	–	0	–
Recreation						
Visitor days	22,327	+	+	– –	0	+
Quality	0	0	+	– – –	0	0

[1]The definition of long-term varies, depending on the resource. For specific information, refer to the appropriate section of Chapter 3, Environmental Consequences.

[2]+ equals positive effect; – equals negative effect.

TABLE OF CONTENTS

PREFACE

SUMMARY
- AREAS OF CONCERN AND CONTROVERSY S-1
- PROPOSED ACTION AND ALTERNATIVES S-1
- TIME SCHEDULE FOR RANGE MANAGEMENT ACTIVITIES S-2
- LONG-TERM ENVIRONMENTAL CONSEQUENCES S-2

PREFERRED ALTERNATIVE 1

TEXT REVISIONS AND ADDITIONS
- TABLE OF CONTENTS 3
- CHAPTER 1 3
- CHAPTER 2 5
- CHAPTER 3 7
- CHAPTER 4 8
- APPENDIX 2 8

CONSULTATION AND COORDINATION
- LIST OF PREPARERS 15
- COORDINATION WITH OTHER AGENCIES 15
- RECIPIENTS OF DRAFT ENVIRONMENTAL IMPACT STATEMENT 15
- PUBLIC COMMENTS AND RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT 19

PREFERRED ALTERNATIVE

In the rangeland management section of the Green Mountain Management Framework Plan (MFP), the grazing allotments are grouped into categories, and for each category recommendations are made for: an intensity of grazing management, including specific multiple-use resource management objectives; range improvement and monitoring needs; and actions needed to improve and maintain rangeland condition and productivity. Under the Preferred Alternative the present management would continue until monitoring results were available. Management action based on these results would then be implemented. Tradeoffs considered in arriving at the recommendation are identified in the MFP.

Category M allotments compose 20 percent of the allotments and 6 percent of the EIS area. The principal objective for these allotments is to maintain or improve their presently satisfactory resource condition and allotment management. Category C allotments compose 26 percent of the allotments and 1 percent of the acreage in the EIS area. The principal short-term objective is to prevent deteriorization of the current resource conditions by managing the lands in a custodial manner. Category I allotments compose 54 percent of the allotments and 93 percent of the acreage in the EIS area. The principal objective for management of Category I allotments is to improve existing resource conditions and reduce or eliminate conflicts. Specific management actions proposed for these allotments depend on the categorization factors affecting each allotment. These factors are shown in Table 1-3 of the Draft EIS. Appendix 3 in the Draft EIS shows the general types of range management actions that could be implemented in Category I allotments to correct the problems identified in the categorization process.

TEXT REVISIONS AND ADDITIONS

TABLE OF CONTENTS

Page i. Management Based on Currently Available Forage Data, page 19 should read, page "20."

Page vi. Add "Comprehensive Management and Use Plans for the Oregon and Mormon National Historic Trails," "Council of Environmental Quality Regulations," and "National Trails System Act of 1976, as amended."

Page vii. Add "Draft, 1981" to Strategic Plan for the Comprehensive Management of Wildlife in Wyoming.

CHAPTER 1

Page 1. Second column, first paragraph should read, "3. Maintain and improve terrestrial, aquatic, and riparian ecosystems to provide wildlife with adequate amounts of forage and habitat to maintain existing populations and planned increases."

Page 2. First column, fourth paragraph, last sentence should read, ". . .(located in the back of this EIS area). . . ."

Page 4. Table 1-1 should show, "Total AUMs are 8,304 (5 percent of the EIS)."

Page 5. Table 1-2 should show, "Total AUMs are 2,471 (1 percent of the EIS area)."

Page 6. First column, heading on the first paragraph should read, "Category I Allotments."

Page 6. First column, first paragraph, first and second sentence should read, "Of the items considered in the categorization process for I allotments, the most important were the experience, observations, records, current rangeland policy, and available range information from the Lander Resource Area, coupled with the permittees' knowledge and experience."

Page 6. First column, after the heading "Categorization Factors," add the following:

Category M Allotments. A number of items were considered in the categorization process for Category M allotments. Most important were the experience, observations, records, current rangeland policy, and available range information from the Lander Resource Area, coupled with the permittees' knowledge and experience. Eighty-six percent of the permittees in the EIS area were consulted.

The following nine factors were used in the categorization process:

Factor 1. Range survey results indicate vegetative production is satisfactory, key species are present in satisfactory amounts, and species composition indicates satisfactory range condition.

Factor 2. Allotment evaluation indicates utilization, trend, and condition of the vegetative resource is satisfactory.

Factor 3. Allotment analysis shows insignificant forage competition between grazing animals and indicates present levels of livestock and management objective levels of other grazing animals can be accommodated.

Factor 4. The distribution of grazing animals is satisfactory. No significant problems exist around wetlands, riparian areas, and meadows.

Factor 5. Turnout dates and seasons of use are consistent with range readiness and sound range management principles.

Factor 6. Significant conflicts with other land uses are not evident.

Factor 7. Based on analysis of soil survey data, the allotment is judged to have potential for high vegetative productivity and is producing at or near potential.

Factor 8. Same as Factor 7, except based on analysis of range survey data on vegetative composition.

Factor 9. There is potential for positive economic return on public investments and, based on factors 7 and 8, there is potential for range improvement through grazing treatments.

Page 6. First column, first paragraph, heading should read, "Category I Allotments." First sentence should read, "A number of items

were considered in the categorization process for Category I allotments."

Page 11. Second column, third paragraph, third sentence should read, "Management actions based on all available data would then be implemented."

Page 12. Table 1-4 should show, "Total AUMs are 33,965 (20 percent of Category I and 19 percent of the EIS area)."

Page 13. Table 1-5 should show, "Total AUMs are 49,172 (29 percent of Category I and 27 percent of the EIS area)."

Page 14. Table 1-6 should show, "Total AUMs are 86,962 (51 percent of Category I and 48 percent of the EIS area)."

Page 15. Table 1-7 should show, "Total AUMs are 104 (0.1 percent of Category I and 0.1 percent of the EIS area)."

Page 15. Table 1-8, under columns titled Proposed Action, Enhanced Livestock Grazing, and No Action, change livestock figures to read, "163,869,311."

Page 16. Second column, second paragraph, fourth sentence should read, "(. . .necessary. For wildlife, increases or decreases may be recommended to Wyoming Game and Fish Department.)"

Page 16. Second column, seventh paragraph should read, "3. Crucial wildlife areas will be critically examined prior to placement of any range improvement projects, which could result in increased livestock use in these areas. Some crucial wildlife areas could require special intensive management actions."

Page 19. Second column, continued paragraph, delete first sentence, "This additional fencing would be paid for by the operators."

Page 19. Second column, second paragraph, second sentence should read, ". . .(allotments 1701, 1802, 1904, 1905, 1908, 1911, 1915, and 1920). . . ."

Page 20. Second column, after third paragraph, add:

U.S. National Park Service

"The U.S. National Park Service has overall, coordinating administrative responsibility of the two national historic trails, Oregon and Mormon, which pass through the EIS area."

Page 22. First column, after second paragraph, add:

Wyoming State Engineer's Office

"Permits are issued by the State Engineer's Office for any water developments, springs, stock ponds, and reservoirs."

Page 22. Second column, fourth paragraph, first sentence should read, "2. During and after grazing of each pasture, forage utilization would be measured by the height-weight method described in the Draft BLM Manual, Section 4430.47G."

Page 23. First column, second paragraph, first sentence should read, "1. Permits specifying the allotment's season of use and number and kind of livestock would be issued to each operator."

Page 23. First column, sixth paragraph should read, "Any range improvements that would occur under the Proposed Action or alternatives would be developed in the following manner."

Page 23. Second column, seventh paragraph should read, "4. Cattleguards or gates would be located where fences cross roads. Cattleguard size would vary with the situation."

Page 24. First column, second paragraph, first sentence should read, "4. Windmills would be drilled and the well cased, the pump facilities placed, and if desired, a storage tank installed."

Page 24. First column, third paragraph, first sentence should read, "5. Dikes on reservoirs would contain a spillway." Second column, delete paragraph 4, which reads, "5. Reclamation of areas . . . wildlife habitat."

Map 1-2. (Located in the back of the Draft EIS.) Delete 0104 from T. 26 N., R. 94 W. Add 2015 to allotment in the southwest corner of T. 27 N., R. 91 W.

CHAPTER 2

Page 25. First column, first paragraph, second sentence should read, "These are topography, climate, land use, and land use plans."

Page 25. First column, second paragraph should read, "1. Floodplains and prime or unique farmlands."

Page 25. First column, fifth paragraph should read, "4. Forestry."

Page 25. First column, sixth paragraph should read, "5. Oregon and Mormon Pioneer National Historic Trails."

Page 26. First column, third paragraph, first sentence should read, "Soils in the Green Mountain EIS area are generally well developed and erosion results in relatively low sedimentation rates."

Page 26. Second column, second paragraph, second sentence should read, "Map 2-1 is a general soils map showing the locations of the different soil types and is located in the back of this EIS."

Page 29. First column, second paragraph, last sentence should read, "In most cases, the quality of the water is within the standards shown in Table 2-2."

Page 29. Second column, third paragraph, first sentence should read, "There are eight major vegetation types in the Green Mountain EIS area: grass, riparian/meadow, sagebrush, greasewood/saltbush, mountain shrub, juniper, conifer, and waste."

Page 29. Second column, third paragraph, third sentence should read, "...(located in the back of this EIS)...."

Page 33. Table 2-4, under column titled Shrubs/Trees, change winterfoot to "winterfat."

Page 37. First column, first paragraph, second sentence should read, "This vegetation type occupies only about 2 percent of the total EIS area; however, it contributes a large portion for livestock and wildlife grazing, because meadow/riparian areas are generally the areas of heaviest use due to the high quality forage and close proximity to water."

Page 39. First column, second paragraph, third sentence should read, "This species occurs in moist meadow areas, often on hummocks with tufts of sedges and rushes."

Page 44. First column, first paragraph, first sentence should read, "In 1979, operations in the EIS area varied in size from 8 to 16,583 AUMs...."

Page 44. Second column, last paragraph, first sentence should read, "In 1981, 96 operators in the EIS area produced an estimated 64,502 AUs, of which about 32,692 AUs used public lands."

Page 45. First column, continued paragraph, last sentence should read, "In 1979, these operations earned 85 percent of the total livestock income in Fremont County and 39 percent of the total livestock income in Carbon County."

Page 45. First column, first paragraph, second sentence should read, "During that year, an estimated $415,430 was collected from operators in the EIS area."

Page 45. Second column, sixth paragraph, delete last sentence, "With the exception...objective levels."

Page 46. Table 2-13, second column, title should read, "Acres in the EIS Area."

Page 47. See revised Table 2-14.

Page 48. First column, first paragraph should read, "Approximately 350 elk are found on Green Mountain in the southeast part of the EIS area and approximately 1,700 are found on the Lander Slope in the western part of the EIS area."

Page 48. First column, second paragraph, first sentence should read, "...(located in the back of this EIS)."

TABLE 2-14

CURRENT GAME ANIMAL POPULATIONS, POPULATION OBJECTIVES, AND ACREAGES OF SEASONAL RANGES

Group or Species	Population Estimate[1]	Trend[2]	Wyoming Game and Fish Department Population Objectives[3]	Acreages (in thousands of acres) and Condition[4] of Seasonal Ranges				
				Crucial Winter	Winter	Yearlong	Summer	Other
Elk	2,050	(I)	2,550	33.6 (P-F)	50.5 (F-G)	18.9 (F-G)	20.6 (P-G)	9.0 (U)[5]
Mule deer	8,400	(I)	11,560	54.3 (F)		705.7 (F)	131.4 (F)	
Moose	225	(S)	225	45.9 (P)		10.8 (P)		
Pronghorn antelope	13,000	(O)	9,830	211.8 (P-G)		443.5 (F-G)	589.3 (P-F)	10.9 (P-F)[6]
Bighorn sheep	80	(I)	160	4.7 (F)		11.7 (U)		
Sage grouse	N.E.	(S)		75.2 (U)	105.0 (U)		215.0 (U)	
Blue grouse	N.E.	(S)				140.0 (U)		
Ruffed grouse	N.E.	(S)				180.0 (U)		
Chukar partridge	N.E.					115.8 (U)		
Hungarian partridge	N.E.					115.8 (U)		
Ducks	5,000-50,000						16.8 (U)	
Geese	200-600						3.2 (U)	

1/N.E. indicates that no estimate is available.
2/(S) indicates stabilized population, (I) indicates increasing population, and (O) indicates overpopulation.
3/Adjusted for the EIS area boundaries.
4/(P) indicates poor condition, (F) indicates fair condition, (G) indicates good condition, and (U) indicates undetermined condition.
5/Severe winter relief range.
6/Restricted winter sites.

Sources: Moneta Planning Unit URA-3, Sweetwater Planning Unit URA-3, and Wyoming Game and Fish Department's Strategic Plan for the Comprehensive Management of Wildlife in Wyoming.

Population status based on current revision of herd unit data that is available from the Wyoming Game and Fish Department, District 6 Headquarters, Lander, Wyoming, 1982.

Page 48. Second column, first paragraph, first sentence should read, "...(shown on Map 2-5, located in the back of this EIS)."

Page 48. Second column, sixth paragraph, first sentence should read, "...(shown on Map 2-6, located in the back of this EIS)...."

Page 49. First column, first paragraph, second sentence should read, "...located in the back of this EIS."

Page 49. First column, last paragraph, first sentence should read, "...(shown on Map 2-7, located in the back of this EIS)...." The following sentence should read, "A relatively large herd of approximately 80 animals uses habitat in the western part of the EIS area."

Page 49. Second column, third paragraph, second sentence should read, "...located in the back of this EIS."

Page 50. First column, first paragraph, third sentence should read, "...(shown on Map 2-8, located in the back of this EIS)...."

Page 50. First column, first paragraph, sixth sentence should read, "...located in the back of this EIS."

Page 53. Second column, first paragraph, second sentence should read, "(See Map 2-9, located in the back of this EIS.)'

Page 53. Second column, last paragraph should read, "...(shown on Map 2-9, located in the back of this EIS)...."

Page 54. First column, first paragraph, second sentence should read, "(See Map 2-9, located in the back of this EIS.)"

Page 54. Second column, second paragraph, second sentence should read, "(See Map 2-9, located in the back of this EIS.)"

CHAPTER 3

Page 65. First column, third paragraph, second sentence should read, "Some previously overgrazed areas would continue declining in trend and increases in production or vegetative cover would be minimal on those areas, thereby resulting in minimal sediment yield reductions."

Page 68. Second column, second paragraph, last sentence should read, "Specific quantification is not possible because of the uncertainty of the exact vegetation response to management actions."

Page 69. First column, third paragraph, fourth sentence should read, "However, the area would eventually approach its climax condition."

Page 69. First column, fourth paragraph, third sentence should read, "Upland areas in poor condition would show a minor improvement in condition and a trend toward the climax vegetative community in the short term."

Page 70. First column, first paragraph, delete the entire paragraph, which reads, "Under this alternative.... to deteriorate."

Page 77. Second column, first paragraph, fourth sentence should read, "Where herds were migrating, fences would cause considerable mortality during severe winter storms when snowfall was greater than 4 inches (Seven Lakes Grazing Environmental Statement)."

Page 79. First column, third paragraph, third sentence should read, "The abundance and species diversity would remain below potential."

Page 79. First column, fourth paragraph, first sentence should read, "Big game habitat would remain essentially unchanged."

Page 80. First column, third paragraph, delete from the third sentence to the end of paragraph, which reads, "Improved distribution and.... not be disturbed."

Page 83. Second column, second paragraph, eighth sentence should read, "Land exchanges to form blocks of public land could have a positive or negative effect." Delete the following sentence, which reads, "Public sale of... public lands."

Page 86. Second column, delete last paragraph which reads, "2. Grazing of domestic....livestock trampling."

Page 87. Because of the change on page 86, paragraph number 3. in the first column becomes paragraph number "2."

Page 87. First column after first paragraph add, "3. Reclamation of areas disturbed by energy and mineral activities will involve seeding or planting native shrubs to restore wildlife habitat."

Page 87. Second column, last paragraph, delete last sentence, which reads, "An unavoidable adverse . . . Data alternative."

CHAPTER 4

Page 91. Second column, add "John Lee, Lee Ranches, Inc."

APPENDIX 2

Page 102. The following replaces Part A.

PART A

METHODOLOGY USED TO DETERMINE FORAGE DEMAND AND SUPPLY

An inventory of the BLM Lander Resource Area was conducted from June 1979 to October 1979, and the data collected were used to calculate the average annual forage production to be distributed among livestock, wild horses, and wildlife. The modified soil vegetation inventory method (SVIM) used is described in the BLM Manual, Section 4412.14D3C(1) and the modified weight estimate method is described in BLM Manual 4412.11B. Study data, maps, and references from the inventory and forage designation process are available for inspection at the BLM Lander Resource Area Office.

Existing vegetation was mapped for each allotment. Within each allotment, vegetation transects were laid out to sample each vegetation type. Each transect consisted of 10 to 20 weight-estimate plots. With this number of plots per transect, enough samples were taken to be within 25 percent of the mean average weight, with 75 percent confidence. That is, the weight of the vegetation in the plots will be within plus or minus 25 percent of the mean average weight for the sampled area.

The data were processed by the BLM Denver Service Center. Data from weight-estimate plots were adjusted to maximum production for the season, using data from a plant phenology study conducted in 1979. Production figures were based on mature dry weights. The production figures were further adjusted to reflect the conditions of an average year for plant growth by using a climate adjustment factor based on precipitation and production data collected from 1965 to 1979, by the University of Wyoming, at study exclosures in the Green Mountain EIS area. The forage production was apportioned among livestock, wildlife, and wild horses, using a forage distribution computer model to process the weight-estimate data. For this model, the use of forage available for grazing, allowable use factors (AUFs) was maximized, subject to proper use factors (PUFs), animal numbers, season of use, and management constraints.

An AUF for each plant species was applied to the production of that species to arrive at the total pounds of herbage plant that could be removed by grazing animals without affecting the viability of the plant. The AUFs were adjusted according to the following seasons of use: spring—March 21 through June 20, summer—June 21 through September 20, fall—September 21 through December 20, winter—December 21 through March 20.

PUFs used in the determination of forage distribution were obtained from PUF tables prepared by the BLM Lander Resource Area Office. PUFs include both the percent of herbage that can be removed without damaging the plant (AUF) and the preference of the grazing animal for that particular plant. PUFs vary with the season of use, because plant defoliation anytime during the growing period is harmful to the plant. PUFs did not exceed 50 percent of the current year's growth.

Wildlife numbers from the Wyoming Game and Fish Department's strategic plan were used in the forage distribution process. The pounds of forage required by the following animals for one month are: cattle—780, horses—900, mule deer—103, antelope—74, sheep—150, elk—374, moose—652, and big-

horn sheep—116. These figures were used to determine total forage consumed for each allotment.

The percent of suitable, potentially suitable, and unsuitable land for each vegetation type was also determined. Suitable land criteria were established only for livestock and wild horses; wildlife use was restricted to seasonal ranges, not allotment boundaries. The criteria were based on distance from water, slope, and production. Vegetation types with a production of 25 pounds per acre or less (32 acres per AUM) were considered unsuitable due to low production.

Amounts of consumptive and nonconsumptive vegetation were obtained from the forage distribution process. Forage supply as herein presented is the best currently available estimate of the present situation. Forage supply could increase or decrease, depending on management actions implemented.

The vegetation production data displayed and used in this EIS were collected using accepted Bureau methods. These data were needed to help determine areas suitable for continued livestock grazing and to provide the basis for developing a rangeland management program and management alternatives.

The vegetation production data have also been used to identify and analyze impacts and mitigation of the Proposed Action and alternatives. Reviewers of this EIS, however, should recognize the limitations of vegetation inventory data. While these data are adequate for purposes of planning and analysis, they must be supported by the results of monitoring studies before making forage allocation decisions.

Pages 103 - 106. See revised Appendix 2, Part B.

Page 107. See revised Appendix 2, Part C.

Page 110. Under column, titled Cattle, LS, change Allotment Number 1914, from 996,528 to "2,124,720."

Page 113. Under column titled Proposed Action, change 201,506,782 to "199,995,766."

Page 115. Under column titled Cattle, change Allotment Number 1914 from 70 to "212" under No.

Page 115. Under column titled Moose, for Allotment Number 1903, add, "14" under No.

PART B

CURRENT ANIMAL NUMBERS AND FORAGE DEMAND
[Forage demand is shown in pounds of air dry forage]

Allotment Number	Antelope[1]		Mule Deer		Cattle		Horses[2]		Domestic Sheep		Elk[3]		Moose		Bighorn Sheep	
	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand
1401	99	88,156	122	151,204	583	3,134,040	118	1,277,550	1,602	809,805						
1403	484	316,372	100	123,940	789	4,307,940	71	768,690	2,635	2,463,720						
1409	800	544,640	165	204,506	1,704	9,303,840	366	3,962,700								
1412	59	43,948	35	43,383	363	1,415,700										
1413	67	38,014			281	1,095,900										
1415	3	2,671	8	9,909					5	126,675						
1622	28	24,931	31	38,398	292	804,024										
1623	170	111,540	42	52,046	600	3,758,040										
1635	92	81,925	119	147,496	600	1,605,240	20	216,540								
1636	454	404,269	119	147,455	1,945	9,815,676	94	1,017,720								
1701	80	71,240	31	38,414	330	1,552,122										
1703	387	344,611	283	350,664	2,206	11,184,420	83	898,920	2,216	753,435						
1705	8	7,126	20	24,792	210	163,800										
1707	32	15,473	3	3,718	553	1,091,298										
1708	14	7,289	16	19,828	49	191,100										
1709	23	11,973	20	24,782	139	758,940										
1711	6	3,123	20	24,782	18	168,480										
1713	12	5,358	20	24,782	150	117,000										
1801	929	602,671	127	157,405	714	4,472,052	120	1,299,600	4,035	3,026,250						
1802	66	58,756	77	95,409	364	1,277,640										
1803	370	329,470	366	453,633	1,429	6,721,182										
1804	770	414,052	201	249,126	1,177	5,967,390										
1805	37	32,945			255	602,706										
1807			36	35,113	102	81,978										

PART B--CONTINUED

CURRENT ANIMAL NUMBERS AND FORAGE DEMAND

Allotment Number	Antelope[1]		Mule Deer		Cattle		Horses[2]		Domestic Sheep		Elk[3]		Moose		Bighorn Sheep	
	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand
1811	115	68,931			102	453,492										
1812	471	321,819			113	531,492										
1901	141	73,386	134	110,416	1,195	4,194,450			2,500	700,005	47	211,497	74	289,488		
1902	52	46,302	100	123,909	289	2,351,154										
1903	245	127,517	143	177,191	734	3,452,280							14	54,768		
1904	157	83,650	270	261,414	190	666,900										
1905	12	6,246	29	23,896	168	589,680					46	176,640	8	31,296		
1906	49	43,630	128	158,599	549	2,997,540	10	63,270								
1907	6	5,343	73	70,679	54	168,480					20	45,142				
1908	79	41,114	374	362,107	588	2,627,976					440	1,146,422	28	109,536	30	41,876
1909	10	8,902	108	104,565	176	278,694										
1910	35	18,211	155	150,071	101	1,038,180	10	45,270			48	180,044	15	58,680		
1911	20	17,812	200	199,820	179	628,290					40	90,246				
1913	10	5,202			126	393,120										
1914	69	35,912	70	86,736	454	2,124,720										
1915	62	55,211	71	87,045	413	1,932,840										
1916	137	95,971	160	198,306	390	2,016,846	6	37,980								
1917	49	43,630	106	131,346	687	2,266,680										
1918	94	48,921	99	81,576	1,186	3,080,532					63	283,529	25	97,800		
1919	35	18,211	9	11,155	219	825,084										
1920	47	24,464	4	3,296	295	1,035,450							8	31,296		
1921	47	24,464	4	3,296	700	2,473,380							6	23,472		
1922			6	4,944	115	406,380							6	23,472		
1926	45	22,548	86	83,265	47	183,300										

PART B--CONTINUED

CURRENT ANIMAL NUMBERS AND FORAGE DEMAND

Allotment Number	Antelope[1]		Mule Deer		Cattle		Horses[2]		Domestic Sheep		Elk[3]		Moose		Bighorn Sheep	
	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand
1934			4	4,954	1	4,212										
1941					1	9,360										
2001	1,513	1,175,601	1,587	1,966,981	3,863	24,195,522	407	4,407,840	4,722	6,374,700	179	805,596	14	93,888		
2003	344	279,165	666	777,444	1,067	6,516,588	146	1,581,210	1,555	1,049,625	114	513,053				
2004	126	68,687	20	24,792	241	939,900										
2005	62	31,961			107	428,142										
2006	29	25,826	33	34,093	231	1,086,462					1	2,992				
2007	14	12,469			352	1,372,800										
2011	32	15,311			589	794,820										
2013	44	39,183	120	148,732	527	1,574,352	2	11,700			33	148,515				
2015	37	16,347	60	74,366	105	428,376					66	197,472				
2018	23	11,973	60	61,985	425	1,335,984					8	23,936				
2019	12	5,728			156	490,386					1	2,992				
2021					15	11,700										
2026			47	48,554	69	324,558										
2205			3	3,327	10	31,200										
2206			5	5,181	10	35,100										
2207	8	4,159	46	23,690	66	205,920					28	81,682				
2209			13	13,030	16	75,270					22	52,098				
2210	12	6,246	36	37,564	54	211,848					46	103,748				
2211	4	2,079	23	28,500	86	203,268					69	155,696			4	5,580
2213	2	1,043	31	16,284	75	265,044					26	76,520	1	3,912	2	2,796
2214			33	34,433	58	180,960					65	146,608				
2215			40	40,664	88	171,600					52	117,286	1	3,912	3	4,188
2217			13	13,565	32	99,840					16	36,091			7	9,767

PART B--CONTINUED

CURRENT ANIMAL NUMBERS AND FORAGE DEMAND

Allotment Number	Antelope[1]		Mule Deer		Cattle		Horses[2]		Domestic Sheep		Elk[3]		Moose		Bighorn Sheep	
	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand	No.	Forage Demand
2218	4	2,079	7	2,863	38	29,640							2	7,824	6	8,375
2219			31	31,827	163	169,104					12	50,565	6	23,472	6	8,375
2220			50	54,250	37	202,878					74	204,802	2	7,824	5	6,983
2222			6	5,686	19	19,734										
2223			5	4,676	5	11,856										
2225			6	5,912					34	20,550						
2228			4	3,945	9	14,040	3	5,400								
2232	6	3,123	24	25,050	30	117,702					19	42,860				
2235	2	1,043			12	28,392					7	15,783				
2236							5	21,780								
2239			1	412	1	9,360										
2240			47	49,059	34	146,640					69	155,621				

[1] As of the 1982 spring prefawning season, current antelope numbers in the EIS area are ranging up to 30 percent above the numbers presented in this table. The Wyoming Game and Fish Department is currently managing the harvest to reduce the populations to the numbers presented in this table.

[2] The horses in allotments 1401, 1403, 1409, 1636, 1703, 1801, 2001, and 2003 are wild horses. The horses in allotments 1635, 1906, 1910, 1916, 2013, 2228, and 2236 are domestic horses.

[3] On livestock allotments in the 1900 and 2200 series, current elk numbers as of February 1982, are below Wyoming Game and Fish Department objective levels by up to 20 percent. Current management is to increase the population to the objective levels presented in this table.

PART C

CURRENT TOTAL FORAGE DEMAND AND SUPPLY FOR ALL GRAZING ANIMALS
[In pounds of air dry forage]

Allotment Number	Forage Demand	Forage Supply	Allotment Number	Forage Demand	Forage Supply
1401[1/]	5,460,755	2,624,609	1920	1,094,506	837,106
1403[1/]	7,980,662	6,300,620	1921	2,524,612	772,264
1409[1/]	14,015,686	12,971,578	1922	434,796	214,088
1412	1,503,031	811,874	1926	382,713	110,517
1413	1,133,914	821,056	1934	9,166	53,679
1415	139,255	139,255	1941	9,380	1,482
1622	867,353	626,489	2001[1/]	39,020,128	32,782,058
1623	3,921,626	1,474,182	2003[1/]	10,717,085	7,626,491
1635	2,051,201	1,918,367	2004	1,033,379	784,871
1636[1/]	11,385,120	5,859,154	2005	460,103	396,689
1701	1,661,776	1,200,450	2006	1,149,373	647,542
1703[1/]	13,532,049	8,953,734	2007	1,385,269	251,695
1705	195,718	126,844	2011	810,131	216,239
1707	1,110,489	987,878	2013	1,922,682	1,256,596
1708	218,216	178,281	2015	716,561	745,327
1709	795,695	608,617	2018	1,433,878	790,052
1711	196,385	143,264	2019	499,106	197,714
1713	147,139	130,994	2021	11,700	7,332
1801[1/]	9,557,977	9,537,854	2026	373,112	181,700
1802	1,431,805	989,233	2205	34,527	14,169
1803	7,504,285	10,641,445	2206	40,281	19,377
1804	6,630,568	4,573,006	2207	315,451	145,049
1805	635,651	591,347	2209	140,398	106,312
1807	117,091	58,000	2210	359,406	129,684
1811	522,423	657,129	2211	395,123	209,701
1812	853,311	1,740,327	2213	365,599	98,254
1901	5,579,242	5,460,448	2214	362,001	121,841
1902	2,521,365	1,208,781	2215	337,650	206,532
1903	3,811,756	3,200,158	2217	159,263	104,351
1904	1,011,964	735,233	2218	50,781	31,749
1905	827,758	530,103	2219	283,343	172,162
1906	3,263,039	2,782,169	2220	476,737	318,645
1907	289,643	271,002	2222	25,420	13,950
1908	4,329,031	2,982,439	2223	16,532	23,770
1909	392,162	240,866	2225	26,462	14,490
1910	1,490,456	504,202	2228	23,385	9,177
1911	936,168	554,700	2232	188,735	77,134
1913	398,322	179,688	2233	45,218	34,604
1914	2,124,720	1,118,942	2236	21,780	9,900
1915	2,075,096	1,132,934	2239	9,772	814
1916	2,349,103	1,382,217	2240	351,320	134,147
1917	2,441,656	1,445,050			
1918	3,592,358	1,951,962	Total	199,995,766	150,526,847
1919	854,450	311,533			

[1/]Allotment containing wild horses.

CONSULTATION AND COORDINATION

LIST OF PREPARERS

TEAM LEADER, Bob Tigner
Responsibility: Overall Direction and Management

ARCHEOLOGIST, Craig Bromley
Responsibility: Cultural Resources

CARTOGRAPHIC TECHNICIAN, Shelley Peele
Responsibility: Cartography

ECONOMIST, Tom Crawford
Responsibility: Economics

EDITORIAL ASSISTANT, Tina Warren
Responsibility: Word Processing

ENVIRONMENTAL SPECIALIST, Walter George
Responsibility: Climate, Land Use, Land Use Plans, and Topography

FISHERIES BIOLOGIST, Fred Stabler
Responsibility: Fisheries

HYDROLOGIST, Scott Carlstrom
Responsibility: Hydrology

OUTDOOR RECREATION PLANNER, Gary Long
Responsibility: Recreation and Visual Resources

RANGE CONSERVATIONIST, Reid Houston
Responsibility: Vegetation

RANGE CONSERVATIONIST, John Likins
Responsibility: Vegetation

RANGE CONSERVATIONIST, Roy Packer
Responsibility: Wild Horses

RANGE CONSERVATIONIST, Andy Warren
Responsibility: Cover Photograph

RANGE CONSERVATIONIST, John Winnepenninkx
Responsibility: Socioeconomics and Wild Horses

REGIONAL PLANNER, Gene Kolkman
Responsibility: Socioeconomics

SOIL SCIENTIST, Steve Howell
Responsibility: Soils and Hydrology

TECHNICAL COORDINATOR, Kirby Boldan
Responsibility: Team Coordination

TECHNICAL PUBLICATIONS EDITOR, Joann Graham
Responsibility: Editing portions of this EIS

WILDLIFE BIOLOGIST, Jerry Gregson
Responsibility: Wildlife

WILDLIFE BIOLOGIST, Jack Welch
Responsibility: Wildlife

WRITER-EDITOR, Alice Cooper
Responsibility: Editing

COORDINATION WITH OTHER AGENCIES AND PUBLIC PARTICIPATION

The agencies, organizations, companies, area ranchers, and individuals that were consulted or expressed interest in the Green Mountain EIS are listed on pages 90, 91, and 92 of the Draft EIS.

RECIPIENTS OF DRAFT ENVIRONMENTAL IMPACT STATEMENT

Comments on the Draft Green Mountain EIS were requested from the following agencies and interest groups. Those who provided comments are noted by an asterisk (*).

Federal

*Environmental Protection Agency
Tennessee Valley Authority
U.S. Department of the Interior
Bureau of Land Management
Bureau of Mines
*Bureau of Reclamation
*U.S. Fish and Wildlife Service
Geological Survey
Minerals Management Service
*National Park Service
U.S. Department of Agriculture
Forest Service
Soil Conservation Service
U.S. Representative Richard Cheney
U.S. Senator Malcolm Wallop
U.S. Senator Alan Simpson

State

Department of Environmental Quality
Sinks Canyon State Park
*State Engineer's Office
*State Planning Coordinator
State Representatives and Senators
  Albany County
  Carbon County
  Fremont County
  Laramie County
  Natrona County
  Sweetwater County
State Soil Conservation Commission
*Water Development Commission
Wyoming Department of Agriculture
*Wyoming Executive Department, Governor Ed J. Herschler
*Wyoming Farm Bureau Federation
*Wyoming Game and Fish Department
Wyoming Highway Department
Wyoming Land Commission
Wyoming Planning Commission
Wyoming Public Lands Coordination Committee
Wyoming Water Planning Program

Local

Carbon County ASCS Office
Carbon County Commissioners
Carbon County Cowbelles
Carbon County School District No. 1
*Carbon County Stock Growers, Mark E. Miller
Council of Governments
Council of Government School Board
Fremont County Association of Governments
Fremont County Planning Commission
Natrona County Weed and Pest Control
Riverton Chamber of Commerce
Sweetwater County Weed and Pest Control

Organizations

American Sheep Producers
American Society for the Preservation of Mustangs and Burros
*American Horse Protection Association
League of Women Voters
Carbon County Wool Growers Auxiliary
Continental Divide Trail Society
Defenders of Wildlife
Environmental Management Services Company
Fremont County Archeological Society
Grain Feed and Seed Dealers Association
Green Mountain EIS Monitoring Committee
Heritage Conservation and Recreation
International Society for the Protection of Mustangs and Burros
Murie Audubon Society
National Audubon Society
National Mustang Association, Inc.
National Wild Horse Association
National Wildlife Federation
Natural Resources Defense Council, Inc.
Nature Conservancy
Old West Grazing EIS Monitoring Project
Old West Range Monitoring Project
Public Lands Council
RMFM&G Society
Rock Springs Grazing Association
Sierra Club
Shoshone and Arapahoe Tribes
Society for Range Management
*Wild Horse Organized Assistance
Wind River Indian Agency
Wildlife Society, The
Wyoming Association of County Agricultural Agents
Wyoming Association of Soil and Water Conservation
Wyoming Heritage Foundation
Wyoming State Historic Preservation Office
Wyoming Outdoor Council
Wyoming Stock Growers Association
Wyoming Wildlife Federation
Wyoming Wool Growers Association

Companies

Amoco Production Company
American Natural Service Company
Anaconda Company
Antaeus: Resources Consulting
Arch Mineral Corporation
Atlantic Richfield Company
Big Eagle Mine
Camp Dresser and McKee, Inc.
Cities Service Gas Company
Columbine Consulting Corporation
Conoco, Inc.
Consolidation Coal Company
Elanco Products Company
Energy Development Company
Environmental Impact Service
Exxon Coal Resources USA, Inc.
Gulf Mineral Resources Company

Horiskey, Bagley, and Hickey
*Hugh W. Jones Realtors
Kerr-McGee Corporation
Lander Energy Company
Louisiana Pacific Corporation
Marathon Oil Company
McCandless and Barrett
Minerals Exploration Company
Molycorp, Inc.
Mountain Bell Telephone Company
Mountain Fuel Supply Company
Niland, McDonough, Niland
North American Coal Corporation
Northern Minerals Company
Northwest Pipeline Corporation
Pacific Power and Light Company
Pathfinder Mines Corporation
Peter Kiweit and Sons Company
Poulson, O'Dell, and Peterson
Rusco, Inc.
Sunedco
Uranerz USA, Inc.
Upland Industries Corporation
Western Nuclear, Inc.
Wold Nuclear Company
Wyo-Ben, Inc.
Wyoming Wildlife Magazine

Universities

Carbon County Extension Agent
Colorado State University
  Department of Range Management
  University Library
Fremont County Extension Agent
Montana State University, Department of Animal and Range Science
Natrona County Extension Agent
Public Administration Service
South Dakota State University, Animal Science Department
University of Wyoming
  College of Agriculture
  Department of Recreation and Park Administration
  Department of Zoology
  IPR Collection
  Range Management Division
  Range Management Society, Wyoming Chapter
  University Library
  Water Resource Research Institute

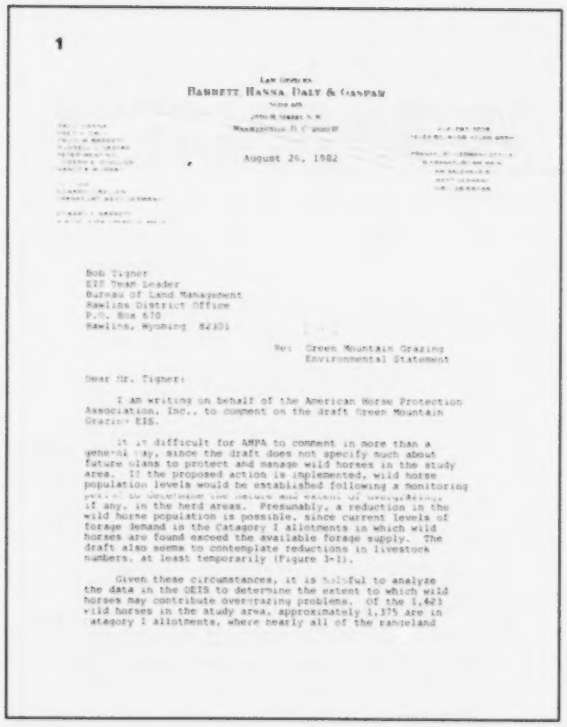
Individuals

George Abernathy
George Allen
Jack Armstrong, Armstrong Ranch, Inc.
J. C. Arnold
Big Creek Ranch
Jacob Booth
L. A. Brazell or Margaret Semon
Howard M. Brokaw
Harold Brown
Leroy Brownell
Senior L. Cabrera
Richard Cist, Estate of Helen Boeseke
Alden R. Condict
Donna Connor
Albert M. Conrad
John Cowdin
Gary Crandall, Bar Eleven Ranch
Jim Cross, Matador Cattle Company
Murray W. Daniels
Ray Difelici
Double K Ranch
Guy Drake
Duncan Ranch
Echeverria Ranches
Chuck Emerson
Frank Erickson
Harold Evans
Raymond and Anne Facinelli
R. Fairsenrio
Russell Finch
D. G. Finlayson
J. B. Foster
Charles Free
Doug Fuller
Kenneth M. Goldsmith
Darrell E. Gothard
Christopher R. Green
E. Robert Grieve, Battle Mountain Company
James H. Grieve
William Grieve
Richard Hamilton
Bill Hancock, Heinold Ranches of Wyoming
Frank and Elsie Hancock
Ken Hansen
Robert Hellyer
Kal Herring
Clarence H. Howe
Tom E. Inman
William C. Irvine
Peter V. Jackson
Tom Jarrard, Bell Springs Ranch
Walter R. Jenks
Charles Johnson
Randy Johnson

Rick Johnson
Jones Land and Livestock Company
Lazy K Cattle Company
Lee Jons
Roy Jons
John G. Kafka
Peter E. Kamp
Randy Keller
Joe Kennah
Stephen Kenney
Dennis H. Knight
Gerald Koershen
Gerald G. Koretz
M. T. Laurence, Jr.
John Litzenberger
Bill Lowe
James H. Magana
Emil A. Malmberg, Three Quarter Circle Ranch
La Verda Mann
Pete Marrin
Ken Martinsen, Willow Creek Ranch
Mayor, town of Lander
Mayor, town of Riverton
Mayor, town of Wamsutter
Kathleen A. McAlister
Bob McClurg
Joe E. McIntosh
William M. McIntosh
Clyde A. McKee, Jr.
Eldon C. McKee
J. T. McLaughlin
Ken McMurray, Diamond Hook Ranch
Mervin Miller
Morton L. Miller, Miller (Joe) Cattle Company
Bill Mone
Tom D. and Kathleen Moore, Plumbago Canyon Ranch
Katherine Morehead
Susan Morgan
R. H. Mowry
William B. Mullins
Thomas Murphree
Paul Newman, Miners Delight
Jim C. Oaks
Kenneth Olson, Olson Ranch, Inc.
Olson Sisters Corporation
Gerald Palm
Norman Palm, Palm Livestock Company
Larry Paxton
Dean L. Peterson
Samuel Peterson
Charles R. Phipps
Roger Pilgrim
Cliff Pool
Purple Heart Cattle Company
Stuart L. Quealy, Quealy Livestock Company
Roy B. Raymond, Ferris Mountain Ranch
Dick Redland
Daryl Romeyn
William H. Romme
Bill Ruby
R. C. Rudolph, Rudolph Farms, Inc.
Karl Rutschman
Warren Ryff
Charles A. Sanger
Bill Sawloy
Lou Schilt
Kelly Sewell, Lazy C Two Bar Ranch
Tom Shaffer
John Sherlock, Willowbrook Ranch, Inc.
Skip Shoutis
Scott Smith
W. A. Smith
Charles D. Snow
Don Stratton, Sandstone Sheep Company
Paul O. Stratton, Sandstone Sheep Company
Bernard Sun, Sun Ranch
Dennis H. Sun
Steve Sun
David Tabaldi
Taft Ranch
Edgar L. Taylor
Mons Teigen
Douglas Thompson
James G. Thompson, The Dirt Farm, Inc.
Victor R. Thomsen, Thomsen Orchards, Inc.
Three Ds and T Ranch
George Tully
Dan Wallis, Wallis Livestock
John H. Weber
Ray Weber, Weber Ranch, Inc.
Sid Weber
Kit Westbrook, Joe Miller and Company
Clifford White, Lonesome Fox Corporation
John Wiener
Williams Land and Livestock Company
Clint Withrow
Susan G. Withrow
Clyde Woolrey, Woolrey Ranch
Harold Young

PUBLIC COMMENTS AND RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Each letter received is presented in full with a response, where appropriate, following each letter. Each comment has been numbered. The response to each comment follows with corresponding number.



1

LAW OFFICES
BARRETT HANNA DALY & GASPAR

August 26, 1982

Bob Tigner
EIS Team Leader
Bureau of Land Management
Rawlins District Office
P.O. Box 670
Rawlins, Wyoming 82301

Re: Green Mountain Grazing
Environmental Statement

Dear Mr. Tigner:

I am writing on behalf of the American Horse Protection Association, Inc., to comment on the draft Green Mountain Grazing EIS.

It is difficult for AHPA to comment in more than a general way, since the draft does not specify much about future plans to protect and manage wild horses in the study area. If the proposed action is implemented, wild horse population levels would be established following a monitoring [illegible] if any, in the herd areas. Presumably, a reduction in the wild horse population is possible, since current levels of forage demand in the Category I allotments in which wild horses are found exceed the available forage supply. The draft also seems to contemplate reductions in livestock numbers, at least temporarily (Figure 1-1).

Given these circumstances, it is helpful to analyze the data in the DEIS to determine the extent to which wild horses may contribute overgrazing problems. Of the 1,643 wild horses in the study area, approximately 1,375 are in Category I allotments, where nearly all of the rangeland

RESPONSES TO LETTER NO. 1

1-1 The problem arises not so much from the total forage consumed by wild horses, but that they concentrate in certain areas causing local problems of overgrazing. BLM's monitoring program thus far supports this statement. Therefore, consideration of wild horse forage use must also include distribution patterns. These are factors which will be the subject of monitoring programs.

1-2 Wild horse herds are protected and managed as components of the public lands. Optimum viable (healthy and reproducing) herds are the result of such management.

1-3 The Proposed Action does not call for removal of horses from allotment 1801. Wild horses are to be removed from allotment 1801, under the alternative based on currently available forage data, because we have never recognized it as a herd area. BLM records indicate that the herd did not exist in allotment 1801 in 1971. The decision not to manage for horses in this area was made through the land use planning system. The problem is also compounded by horse trespass from the Wind River Indian Reservation.

1-4 "Very light" in this context means 1 to 20 percent forage utilization.

management projects will be directed. The horses are presently found in only eight of the 85 Category I allotments. Since the proposed action contemplates removing the entire 120-horse population in allotment 1801 because they were not found there in 1971, actual numbers will be only 1,255 horses in seven Category I allotments, plus about 50 horses in other allotments.

The seven Category I allotments*/ are currently grazed by 12,157 cattle and 12,730 sheep. Together they consume nearly six times the forage needed by wild horses. (This ratio does not change even if allotment 1801 is included in the analysis.) Livestock forage demand is over 70% of total forage demand on these allotments; wild horse demand is about 13.5% and wildlife demand is about 8%. Livestock forage demand in all the Category I allotments is nearly 11 times the current wild horse forage demand. Alternatively, wild horse forage demand is only about 7.5% of total forage demand in the Category I allotments, even less than total wildlife demand.

1-1

In relative terms, therefore, wild horse use in the Category I allotments is a minor factor. Livestock use in these allotments is enormous: over 200,000 AUMs, by my calculations, as opposed to fewer than 20,000 AUMs for wild horses. If overgrazing is a problem -- and it may well be, since forage supply is only about 75% of current forage demand in the seven Category I allotments -- it would seem that most of the overgrazing is attributable to cattle and sheep. Table 1-8 (DEIS at 15) apparently supports that conclusion, since it shows that livestock forage demand exceeds supply by about 50 million pounds.

For this reason, the indefiniteness of the DEIS -- which is typical of those written pursuant to the rangeland management policy adopted earlier this year -- is of concern to AHPA.

---

*/ Nos. 1401, 1403, 1409, 1636, 1701, 2001 and 2003.

It is easy to foresee that as grazing level adjustments are made, livestock interests will urge that large cuts be made in wild horse forage allocations in order to minimize livestock cuts. The data in the DEIS suggests that such a result would be inappropriate. In any event, it would be helpful for the final EIS to clarify the Bureau's approach toward this sort of problem, especially by explaining why wild horse reductions, if implemented, would be to the "minimum viable herd levels." Such drastic reductions are rarely justifiable.

1-2

Furthermore, the rationale for removing all of the horses in allotment 1801 is not clear. Even assuming that no horses were found there in 1971 (a questionable assumption, since censuses were so poor at that time), forage supply and demand in that allotment are virtually in balance. The Wild Horse Act does not mandate that wild horses be removed from areas where they did not exist in 1971, and since no real resource problems exist in the allotment, the horses should be permitted to remain.

1-3

Finally, unlike many environmental statements, the draft does not contain much data regarding anticipated increases in forage production due to the implementation of the grazing program. However, AHPA was encouraged to note that the draft acknowledges that wild horse numbers would be allowed to increase if forage production rises, at least if forage use is "very light." It would be helpful if this term were defined in the final EIS.

1-4

Very truly yours,

Russell J. Gaspar

Attorney for American Horse Protection Association, Inc.

cc: Joan R. Blue
RJG:bb

2

Reference
1792-3M-RIS

W'HOA!

WILD HORSE ORGANIZED ASSISTANCE
INC
A Public Advocate for the Welfare of Wild Free-Roaming Horses and Burros

BOARD OF TRUSTEES
DAVID R. BELDING
JACK C. McELWEE
GORDON W. HARRIS
BELTON P. HOURAS
GERTRUDE BROWN, Honorary
Jo Hampshire
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

P. O. Box 111
Reno, Nevada 89504
Telephone 323-1565
Area Code "07"

Kathryn Cushman
Box 26
Canterbury, New Hampshire 03224
August 26, 1982

Dale Brubaker
Area Manager
BLM Lander Resource Area Office
Lander, Wyoming 82520

Dear Mr. Brubaker:

Thank you for the opportunity to comment on the Green Mountain Grazing Draft Environmental Impact Statement.

2-1 "Grazing decisions would be made after adequate information became available." (p. 11, Green Mountain GDEIS, Grazing Decisions) Is this procedure to be applied to wild horses as well as livestock? Wild horses "shall be considered cooperably with other resource values." (4740.0-8 (a)) The word "shall" indicates a mandate. So wild horses should be removed until "adequate information" is available. The

2-2 GMGDEIS indicates that the horses (97% or 70% of the herd) will be removed, THEN grazing decisions will be made regarding livestock and wildlife "after adequate information" is available. Please explain why, if grazing decisions will not be based on present inadequate data, how can the BLM justify the adjustment of wild horses--based on the same inadequate data?

Wild horses presently are consuming only a small percentage of water when compared with livestock. Livestock consumes 85% while wild horses consume only 8%. (p. 28, Table 2-1)

Mineral and energy exploration and development has reduced suitable wildlife habitat by at least 37,000 acres and homesite development has reduced habitat by at least another 10,000 acres. (p. 48, GMGDEIS) These losses are discounted and at the same time much controversy occurs over the use of land by 1,423 wild horses.

2-3 Are horses to be removed to try to compensate for these losses? Why

2-4 are wild horses the only public land user slated for immediate removal?

2-5 A 20% annual increase in the horse herd is listed. (p. 50, GMGDEIS) Does this figure take mortality into account?

Water wells can be used to encourage horses to move to different areas. (p. 87, GMGDEIS, Wild Horses, 3) Livestock would be more responsible for damage around water sources than wild horses as

Green Mountain
Page 2

cattle tend to mill around water sources, often going into the water where possible. Horses tend to come in, drink and then leave. Using water wells to change horse distribution is feasible provided care is taken not to use the method during extremely hot weather when water is especially critical to the animals' survival.

"Wild horse numbers and locations could be monitored annually to assess the effects of horse removals..." (p. 87, Wild Horses, 1) "Could" indicates that monitoring probably will not be done, particularly when funding and manpower cuts are considered. Monitoring AFTER removal, especially such a massive removal, is much like closing the barn door after the horse is gone...too little, too late! Why not monitor first, accumulate the necessary data then consider

2-6 options for removal? Why is it that BLM insists on doing things exactly backwards when wild horses are concerned? Any knowledgeable scientist is aware that the gathering of information precedes action.

Can you name specific areas where horses are injuring range

2-7 vegetation? Do other species use the same areas? How do you separate horse use from livestock and wildlife use? Do you have full resource data for your determinations? Why is BLM proposing to monitor livestock before making adjustments in numbers and at the same time proposing to do just the opposite for wild horses?

The Green Mountain GDEIS presents no valid reasons or specific data to justify a 70% reduction in the wild horse herd. Horses are in "excellent health". (p. 50, GMGDEIS, Wild Horses) The horses

2-8 use only 8 of 157 allotments, and in comparison to livestock do not utilize an excessive percentage of forage. Horses have not previously been allocated appropriate portions of available forage. It is time they receive their fair share, without reductions, and let population decisions be made when adequate data is available to justify them.

I would like copies of the Adobe and Sweetwater Planning Units (MAPS).

Sincerely,

Kathryn Cushman

Kathryn Cushman
Wild Horse Organized Assistance

cc: Dawn Lappin, Director WHOA
Bob Tigner, EIS Team Leader
Robert Springer, Wild Horse Specialist

RESPONSES TO LETTER NO. 2

2-1 Yes.

2-2 No horses will be removed until adequate information is available under the Proposed Action. Specific wild horse removal is analyzed under the Available Forage alternative. The specific actions under this alternative are based on data currently available, not the additional data that would be gathered under the Proposed Action.

2-3 Wildlife habitat losses are not to be recovered by reducing wild horse numbers.

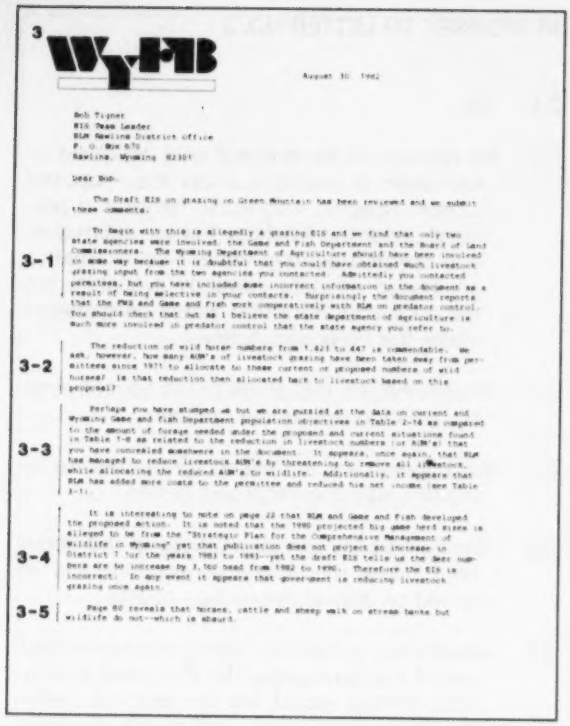
2-4 Wild horses are not slated for immediate removal under the Proposed Action.

2-5 The 20 percent annual increase in the horse herd takes mortality into account and is based on annual population counts.

2-6 Monitoring is currently being conducted and would continue under the Proposed Action. Wild horses would not be removed under the Proposed Action until monitoring has yielded adequate data to indicate the need for removal.

2-7 One year's data indicate that wild horses have been a significant factor in the overuse of the vegetation in allotments 1401, 1403, 1636, 1703, and 2003. Other species do use these areas. Actual use information, aerial observations, and vegetative studies are used to separate use by different species. Monitoring studies are underway, gathering data adequate for range management decisions. Studies will be conducted before, during, and after livestock grazing in these allotments in an attempt to document how much damage is occurring from the different animals using each area.

2-8 The Proposed Action does not recommend a 70 percent reduction in wild horse numbers. The specific reduction is analyzed as an alternative to the Proposed Action.



3

WyFB

August 30, 1982

Bob Turner
EIS Team Leader
BLM Rawlins District Office
P. O. Box 670
Rawlins, Wyoming 82301

Dear Bob,

The Draft EIS on grazing on Green Mountain has been reviewed and we submit these comments:

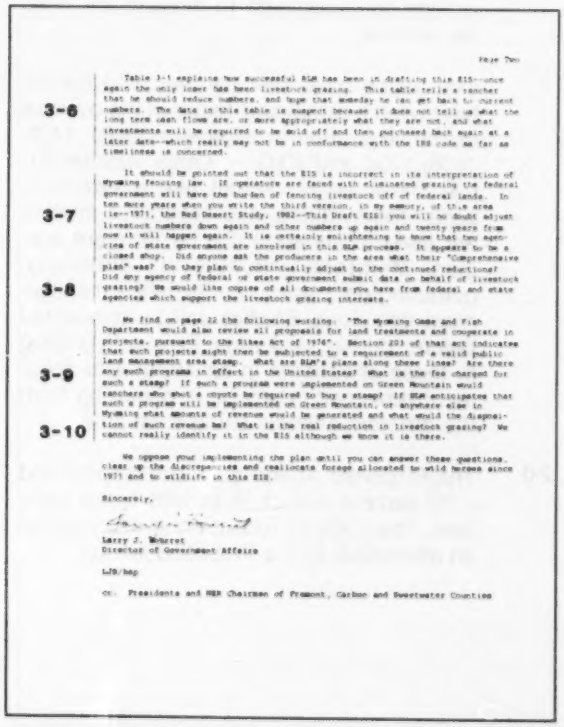
3-1 To begin with this is allegedly a grazing EIS and we find that only two state agencies were involved, the Game and Fish Department and the Board of Land Commissioners. The Wyoming Department of Agriculture should have been involved in some way because it is doubtful that you could have obtained such livestock grazing input from the two agencies you contacted. Admittedly you contacted permittees, but you have included some incorrect information in the document as a result of being selective in your contacts. Surprisingly the document reports that the FWS and Game and Fish work cooperatively with BLM on predator control. You should check that out as I believe the state Department of Agriculture is much more involved in predator control that the state agency you refer to.

3-2 The reduction of wild horse numbers from 1,621 to 447 is commendable. We ask, however, how many AUM's of livestock grazing have been taken away from permittees since 1971 to allocate to these current or proposed numbers of wild horses? Is that reduction then allocated back to livestock based on this proposal?

3-3 Perhaps you have stumped us but we are puzzled at the data on current and Wyoming Game and Fish Department population objectives in Table 2-14 as compared to the amount of forage needed under the proposed and current situations found in Table 1-8 as related to the reduction in livestock numbers (or AUM's) that you have concealed anywhere in the document. It appears, once again, that BLM has managed to reduce livestock AUM's by threatening to remove all livestock, while allocating the reduced AUM's to wildlife. Additionally, it appears that BLM has added more costs to the permittee and reduced his net income (see Table 3-1).

3-4 It is interesting to note on page 22 that BLM and Game and Fish developed the proposed action. It is noted that the 1990 projected big game herd sizes is alleged to be from the "Strategic Plan for the Comprehensive Management of Wildlife in Wyoming" yet that publication does not project an increase in District 7 for the years 1981 to 1991--yet the draft EIS tells us the deer numbers are to increase by 3,100 head from 1982 to 1990. Therefore the EIS is incorrect. In any event it appears that government is reducing livestock grazing once again.

3-5 Page 80 reveals that horses, cattle and sheep walk on stream banks but wildlife do not--which is absurd.



Page Two

3-6 Table 3-1 explains how successful BLM has been in drafting this EIS--once again the only loser has been livestock grazing. This table tells a rancher that he should reduce numbers, and hope that someday he can get back to current numbers. The data in this table is suspect because it does not tell us what the long term cash flows are, or more appropriately what they are not, and what investments will be required to be sold off and then purchased back again at a later date--which really may not be in conformance with the IRS code as far as timeliness is concerned.

3-7 It should be pointed out that the EIS is incorrect in its interpretation of Wyoming fencing law. If operators are faced with eliminated grazing the federal government will have the burden of fencing livestock off of federal lands. In ten more years when you write the third version, (in my memory of this area (ie--1971, the Red Desert Study, 1982--This Draft EIS) you will no doubt adjust livestock numbers down again and other numbers up again and twenty years from now it will happen again. It is certainly enlightening to know that two agencies of state government are involved in this BLM process. It appears to be a closed shop. Did anyone ask the producers in the area what their "Comprehensive plan" was? Do they plan to continually adjust to the continued reductions?

3-8 Did any agency of federal or state government submit data on behalf of livestock grazing? We would like copies of all documents you have from federal and state agencies which support the livestock grazing interests.

3-9 We find on page 22 the following wording: "The Wyoming Game and Fish Department would also review all proposals for land treatments and cooperate in projects, pursuant to the Sikes Act of 1974". Section 203 of that act indicates that such projects might then be subjected to a requirement of a valid public land management area stamp. What are BLM's plans along these lines? Are there any such programs in effect in the United States? What is the fee charged for such a stamp? If such a program were implemented on Green Mountain would ranchers who shot a coyote be required to buy a stamp? If BLM anticipates that such a program will be implemented on Green Mountain, or anywhere else in Wyoming what amounts of revenue would be generated and what would the disposition of such revenue be? What is the real reduction in livestock grazing? We cannot really identify it in the EIS although we know it is there.

3-10 We oppose your implementing the plan until you can answer these questions, clear up the discrepancies and reallocate forage allocated to wild horses since 1971 and to wildlife in this EIS.

Sincerely,

Larry J. Wehrer
Director of Government Affairs

LJW/bsp

cc: Presidents and WSB Chairmen of Fremont, Carbon and Sweetwater Counties

RESPONSES TO LETTER No. 3

3-1 It is BLM's policy to send the Notice of Intent to the Wyoming State Clearing House for distribution to the state's agencies. In addition, a public meeting was held in Lander on November 1981, and a public hearing was held in Lander on August 1981. Both were announced by letter through the Green Mountain mailing list and through the news media.

3-2 There have been no reductions in livestock AUMs as a result of current or projected numbers of wild horses. Therefore, no AUM's will be allocated back to livestock on this basis.

3-3 No reduction in AUMs has been made under the Proposed Action, nor are they concealed anywhere else in the document. Reductions would not be made until a need is found, based on monitoring. Table 2-14 shows current numbers of wildlife and Table 1-8 shows forage consumption by the animals using the area under the Proposed Action and each alternative. Reductions would not be made unless monitoring indicated the need. Table 3-1 was designed to indicate the short-term impacts from the Proposed Action, assuming the forage supply data in Table 1-8 is correct.

Without an analysis on an individual basis (which would violate confidentiality), it would be very difficult to evaluate the long-term cash flows. In addition, sufficient baseline information is not available at this time to provide the necessary data to analyze the Proposed Action in more detail.

A part of the confusion on Table 3-1 may be with the assumption used in the economic analysis. Because specific actions in the Proposed Action will be developed based on future monitoring, we used currently available data on forage supply to estimate future herd sizes. This assumption, of course, would have to be changed as forage supply data is further accumulated through monitoring.

3-4 The Wyoming Game and Fish Department did not "develop the Proposed Action." There was "coordination between BLM and Wyo-

ming Game and Fish Department in developing the Proposed Action."

The Green Mountain EIS area is in District 6, headquartered at Lander. District 7 is in Casper.

3-5 Big game ungulates do not concentrate for long periods of time near the water's edge and therefore do not do the bank damage that livestock and wild horses do. There would be no drastic changes in numbers of big game ungulates regardless of the alternative selected. Therefore, wild ungulate numbers were not considered an important variable.

3-6 See 3-3.

3-7 See text change page 9, first paragraph, second sentence.

3-8 We consulted with each of the livestock operators listed in the EIS on pages 91 and 92. Their year-round operation was discussed in context with their federal grazing permits. The public land allotments were evaluated and the operators' views and opinions were discussed.

There are no reductions planned at this time. Therefore, no adjustments by livestock operators are needed.

To our knowledge, no state or federal agency submitted data on behalf of livestock grazing.

3-9 The Sikes Act of 1974 (16 USC 670) relates to the formulation of comprehensive plans to develop, maintain, and coordinate programs for the conservation and rehabilitation of wildlife, fish, and game on public lands. The BLM refers to these as Habitat Management Plans (HMPs). HMP development and implementation is a joint effort between the BLM and the state game and fish agency.

Section 2203 of the Sikes Act sets forth provisions for the sale of public land management area stamps that authorize the user to hunt, fish, and trap on HMP areas. Establishment of a hunting and fishing stamp program on an HMP area would take place

only at the request of the state game and fish agency and must be mutually agreed to by the Secretary of the Interior.

To date, no Sikes Act stamp programs have been established on HMP areas in Wyoming, and the Wyoming Game and Fish Department has not indicated a desire to do so. BLM has no such program in the U.S. The exact requirements of such a stamp program, such as who may or may not be required to purchase one, the administration, enforcement and collection of fees would be the responsibility of the Wyoming Game and Fish Commission.

3-10 There are no reductions planned for livestock at this time. Until monitoring indicates a needed change in animal numbers, the current situation will continue.

4

WyFB

August 31 1992

Dale Brubaker
Area Manager
BLM Lander Resource Area Office
P. O. Box 589
Lander, Wyoming 82520

Dear Dale:

The Draft EIS on grazing on Green Mountain has been reviewed and we submit these comments.

To begin with this is already a grazing EIS and we find that only two state agencies were involved, the Game and Fish Department and the Board of Land Commissioners. The Wyoming Department of Agriculture should have been involved in some way because it is doubtful that you could have obtained such livestock grazing input from the two agencies you contacted. Admittedly you contacted permittees, but you have included some incorrect information in the document as a result of being selective in your contacts. Surprisingly the document reports that the FWS and Game and Fish work cooperatively with BLM on predator control. You should check that out as I believe the state department of agriculture is much more involved on predator control that the state agency you refer to.

The reduction of wild horse numbers from 1,421 to 447 is commendable. We ask, however, how many AUM's of livestock grazing have been taken away from permittees since 1971 to allocate to these current or proposed numbers of wild horses? Is that reduction then allocated back to livestock based on this proposal?

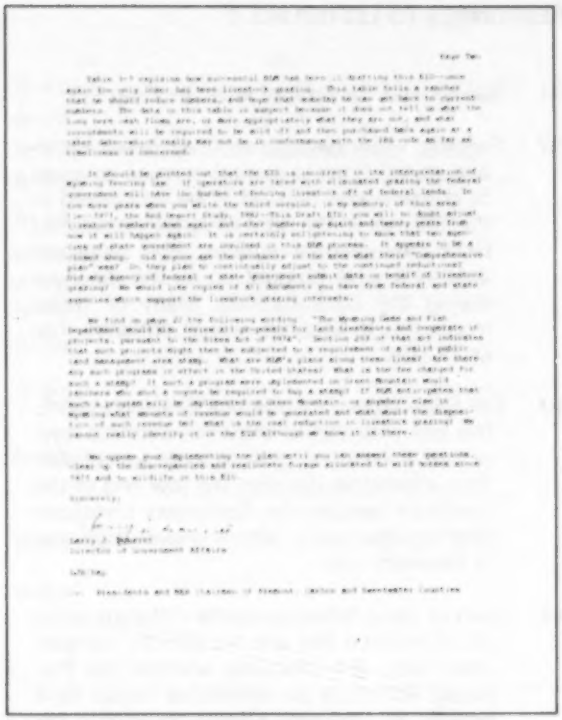
Perhaps you have stumped us but we are puzzled at the data on current and Wyoming Game and Fish Department population objectives in Table 2-14 as compared to the amount of forage needed under the proposed and current situations found in Table 1-9 as related to the reduction in livestock numbers (or AUM's) that you have concluded elsewhere in the document. It appears, once again, that BLM has managed to reduce livestock AUM's by threatening to remove all livestock, while allocating the reduced AUM's to wildlife. Additionally, it appears that BLM has added more cuts to the permittee and reduced his net income (see Table 1-7).

It is interesting to note on page 22 that BLM and Game and Fish developed the proposed action. It is noted that the 1990 projected big game herd sizes is alleged to be from the "Strategic Plan for the Comprehensive Management of Wildlife in Wyoming" yet that publication does not project an increase in District 7 for the years 1983 to 1993--yet the Draft EIS tells us the deer numbers are to increase by 3,100 head from 1982 to 1990. Therefore the EIS is incorrect. In any event it appears that government is reducing livestock grazing once again.

Page 90 [illegible] that horses, cattle and sheep walk on stream banks but wildlife do not--which is absurd.

RESPONSES TO LETTER NO. 4

Letter 4: Same letter as 3. See comments listed for letter no. 3.



5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295

AUG 24 1981

Ref: 8PM-EA

Dale Brubaker
Area Manager
BLM Lander Resource Area Office
P.O. Box 589
Lander, Wyoming 82520

Dear Mr. Brubaker:

The Regional Office of the Environmental Protection Agency has reviewed the draft environmental impact statement (EIS) for the Green Mountain Grazing Unit. EPA concurs with the approaches taken in this document for improving rangeland conditions and grazing management. In particular, we are pleased with the proposals for water quality protection, using measures such as riparian fencing, rest-rotation, and monitoring of the soils and water environment.

5-1 On page 32 of the draft EIS, it is mentioned under Standard Operating Procedures that "Water quality and quantity would be monitored as necessary to determine problem areas". We recommend that some detail be provided in the final EIS as to the kinds of monitoring plans proposed for identifying water quality problems.

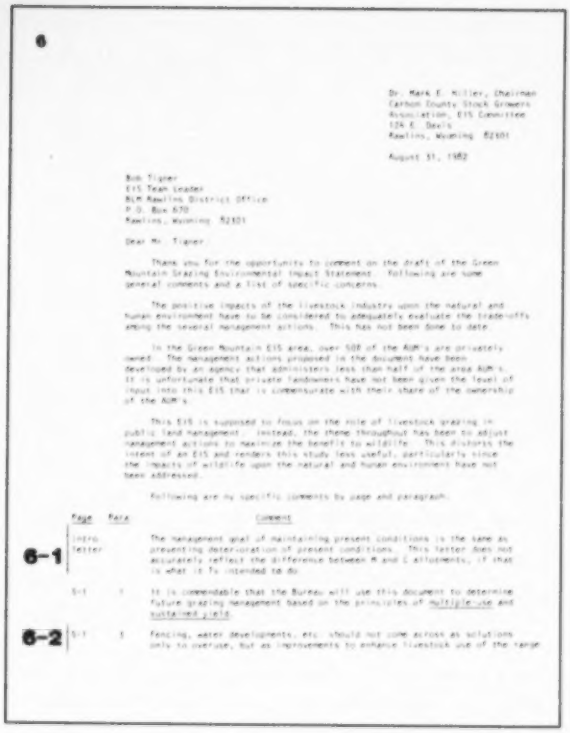
Based on EPA's system of rating EISs under its review, we have rated this EIS as LO-1. This means that we have no objections to the proposal.

Sincerely yours,

Steven J. Durham
Regional Administrator

RESPONSE TO LETTER NO. 5

5-1 There are no specific monitoring plans for identifying water quality since the problems vary by allotment and work activity and would, therefore, be specifically dealt with in individual allotment monitoring plans.



6

Dr. Mark E. Miller, Chairman
Carbon County Stock Growers
Association, EIS Committee
124 E. Davis
Rawlins, Wyoming 82301

August 31, 1982

Bob Tigner
EIS Team Leader
BLM Rawlins District Office
P.O. Box 670
Rawlins, Wyoming 82301

Dear Mr. Tigner:

Thank you for the opportunity to comment on the draft of the Green Mountain Grazing Environmental Impact Statement. Following are some general comments and a list of specific concerns.

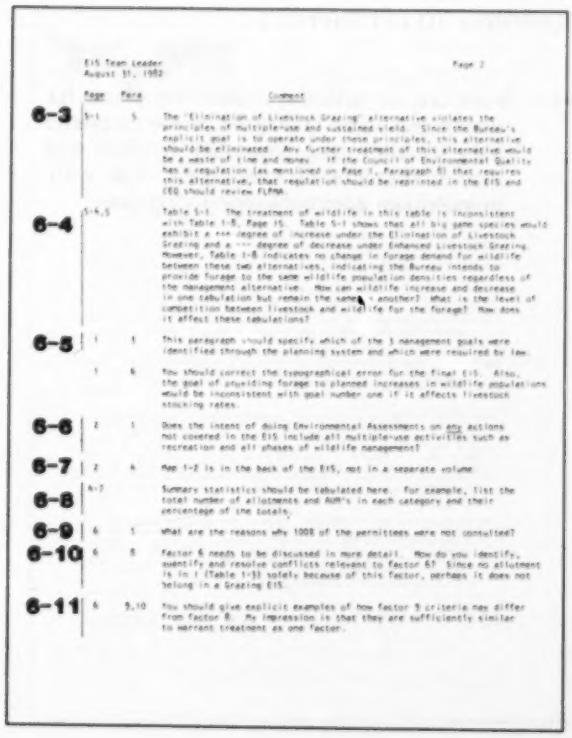
The positive impacts of the livestock industry upon the natural and human environment have to be considered to adequately evaluate the trade-offs among the several management actions. This has not been done to date.

In the Green Mountain EIS area, over 50% of the AUM's are privately owned. The management actions proposed in the document have been developed by an agency that administers less than half of the area AUM's. It is unfortunate that private landowners have not been given the level of input into this EIS that is commensurate with their share of the ownership of the AUM's.

This EIS is supposed to focus on the role of livestock grazing in public land management. Instead, the theme throughout has been to adjust management actions to maximize the benefits to wildlife. This distorts the intent of an EIS and renders this study less useful, particularly since the impacts of wildlife upon the natural and human environment have not been addressed.

Following are my specific comments by page and paragraph.

	Page	Para	Comment
6-1	Intro. letter		The management goal of maintaining present conditions is the same as preventing deterioration of present conditions. This letter does not accurately reflect the difference between M and I allotments, if that is what it is intended to do.
	S-1	1	It is commendable that the Bureau will use this document to determine future grazing management based on the principles of multiple-use and sustained yield.
6-2	S-1	1	Fencing, water developments, etc. should not come across as solutions only to overuse, but as improvements to enhance livestock use of the range.



EIS Team Leader
August 31, 1982

Page 2

	Page	Para	Comment
6-3	S-1	5	The "Elimination of Livestock Grazing" alternative violates the principles of multiple-use and sustained yield. Since the Bureau's explicit goal is to operate under these principles, this alternative should be eliminated. Any further treatment of this alternative would be a waste of time and money. If the Council of Environmental Quality has a regulation (as mentioned on Page 1, Paragraph 5) that requires this alternative, that regulation should be reprinted in the EIS and CEQ should review FLPMA.
6-4	S-4,5		Table S-1. The treatment of wildlife in this table is inconsistent with Table 1-8, Page 15. Table S-1 shows that all big game species would exhibit a ++ degree of increase under the Elimination of Livestock Grazing and a --- degree of decrease under Enhanced Livestock Grazing. However, Table 1-8 indicates no change in forage demand for wildlife between these two alternatives, indicating the Bureau intends to provide forage to the same wildlife population densities regardless of the management alternative. How can wildlife increase and decrease in one tabulation but remain the same in another? What is the level of competition between livestock and wildlife for the forage? How does it affect these tabulations?
6-5	1	1	This paragraph should specify which of the 3 management goals were identified through the planning system and which were required by law.
	1	6	You should correct the typographical error for the final EIS. Also, the goal of providing forage to planned increases in wildlife populations would be inconsistent with goal number one if it affects livestock stocking rates.
6-6	2	1	Does the intent of doing Environmental Assessments on any actions not covered in the EIS include all multiple-use activities such as recreation and all phases of wildlife management?
6-7	2	4	Map 1-2 is in the back of the EIS, not in a separate volume.
6-8	A-2		Summary statistics should be tabulated here. For example, list the total number of allotments and AUM's in each category and their percentage of the totals.
6-9	6	1	What are the reasons why 100% of the permittees were not consulted?
6-10	6	8	Factor 6 needs to be discussed in more detail. How do you identify, quantify and resolve conflicts relevant to factor 6? Since no allotment is in I (Table 1-5) solely because of this factor, perhaps it does not belong in a Grazing EIS.
6-11	6	9,10	You should give explicit examples of how factor 9 criteria may differ from factor 6. My impression is that they are sufficiently similar to warrant treatment as one factor.

RESPONSES TO LETTER NO. 6

6-1 See revised transmittal letter in Final EIS.

6-2 Fencing, water development, etc. were identified as solutions to current overuse as areas of concern that needed to be addressed in the EIS, not in the light of strictly proposed BLM management actions. The proposed solutions were brought up by the ranchers during the consultations. Many of these measures, if adopted, would enhance livestock use.

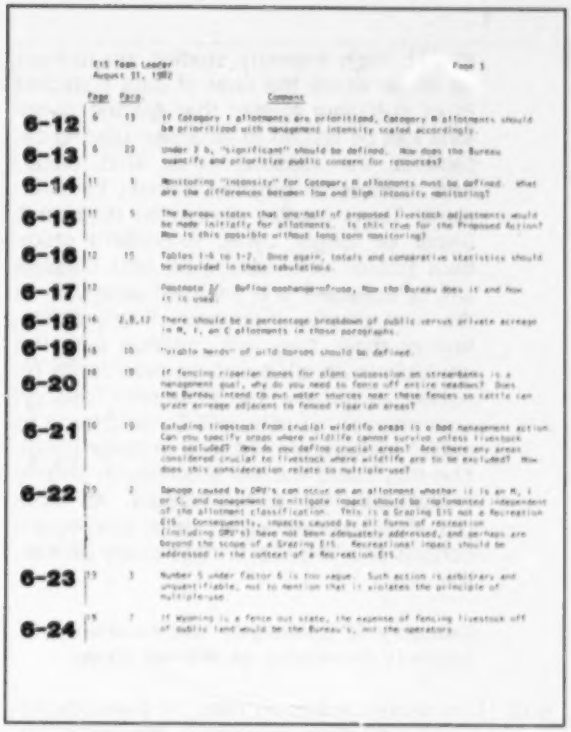
6-3 The Elimination of Livestock Grazing alternative was included to show the extreme level of use if livestock grazing were eliminated. This alternative portrays the low end of the spectrum versus the Enhanced Livestock Grazing alternative, which shows high end of livestock use.

6-4 Each of these tables presents different types of information that are not directly comparable. Table S-1 indicates whether the Proposed Action or an alternative would have beneficial or adverse effects on wildlife, especially in terms of forage competition. For example, forage competition is anticipated to decline under the Proposed Action and is, therefore, shown as a positive benefit. Forage competition is anticipated to continue and possibly increase under the Enhanced Livestock Grazing alternative and is shown as negatively affecting wildlife. In Table 1-8, forage demand remains the same because Wyoming Game and Fish Department population objectives are anticipated to remain the same under each alternative.

6-5 All three of the management goals have their basis in the following laws: Taylor Grazing Act, Federal Land Policy and Management Act, Public Rangeland Improvement Act, and the Wild Horse and Burro Act. These goals were developed through the BLM land use planning process and tailored to the Green Mountain EIS area. Also see text change, page 1, second column, first paragraph.

6-6 Yes.

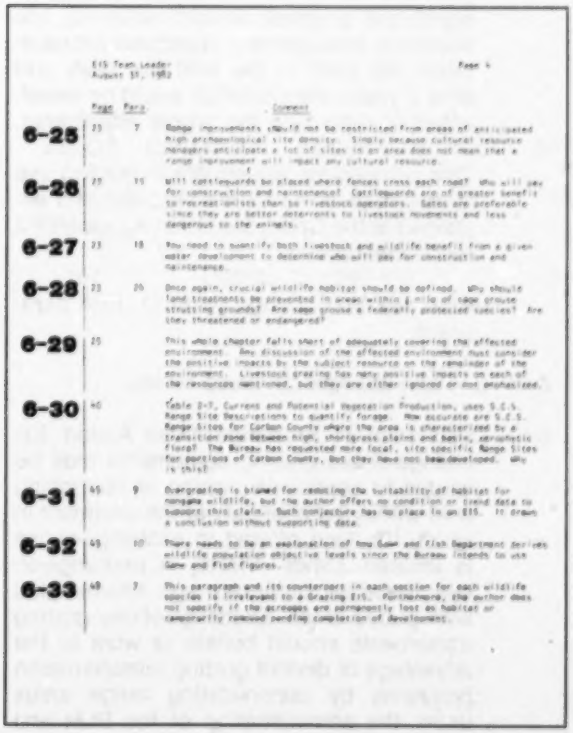
6-7 See text change, page 2, fourth paragraph.



EIS Team Leader
August 31, 1982

Page 3

	Page	Para	Comment
6-12	6	13	If Category I allotments are prioritized, Category M allotments should be prioritized with management intensity scaled accordingly.
6-13	6	23	Under 2 b, "significant" should be defined. How does the Bureau quantify and prioritize public concern for resources?
6-14	11	1	Monitoring "intensity" for Category M allotments must be defined. What are the differences between low and high intensity monitoring?
6-15	11	5	The Bureau states that one-half of proposed livestock adjustments would be made initially for allotments. Is this true for the Proposed Action? How is this possible without long term monitoring?
6-16	12	15	Tables 1-6 to 1-7. Once again, totals and comparative statistics should be provided in these tabulations.
6-17	12		Footnote 2/ Define cochemprofrose, How the Bureau does it and how it is used.
6-18	16	2,8,12	There should be a percentage breakdown of public versus private acreage in M, I, an C allotments in these paragraphs.
6-19	16	10	"viable herds" of wild horses should be defined.
6-20	18	18	If fencing riparian zones for plant succession on streambanks is a management goal, why do you need to fence off entire meadows? Does the Bureau intend to put water sources near these fences so cattle can graze acreage adjacent to fenced riparian areas?
6-21	16	19	Excluding livestock from crucial wildlife areas is a bad management action. Can you specify areas where wildlife cannot survive unless livestock are excluded? How do you define crucial areas? Are there any areas considered crucial to livestock where wildlife are to be excluded? How does this consideration relate to multiple-use?
6-22	20	2	Damage caused by ORV's can occur on an allotment whether it is an M, I or C, and management to mitigate impact should be implemented independent of the allotment classification. This is a Grazing EIS not a Recreation EIS. Consequently, impacts caused by all forms of recreation (including ORV's) have not been adequately addressed, and perhaps are beyond the scope of a Grazing EIS. Recreational impact should be addressed in the context of a Recreation EIS.
6-23	23	3	Number 5 under Factor 6 is too vague. Such action is arbitrary and unquantifiable, not to mention that it violates the principle of multiple-use.
6-24	25	7	If Wyoming is a fence out state, the expense of fencing livestock off of public land would be the Bureau's, not the operators.



EIS Team Leader
August 31, 1982

Page 4

	Page	Para	Comment
6-25	33	7	Range improvements should not be restricted from areas of anticipated high archaeological site density. Simply because cultural resource managers anticipate a lot of sites in an area does not mean that a range improvement will impact any cultural resource.
6-26	33	15	Will cattleguards be placed where fences cross each road? Who will pay for construction and maintenance? Cattleguards are of greater benefit to recreationists than to livestock operators. Gates are preferable since they are better deterrents to livestock movements and less dangerous to the animals.
6-27	33	18	You need to quantify both livestock and wildlife benefit from a given water development to determine who will pay for construction and maintenance.
6-28	33	26	Once again, crucial wildlife habitat should be defined. Why should land treatments be prevented in areas within 2 mile of sage grouse strutting grounds? Are sage grouse a federally protected species? Are they threatened or endangered?
6-29	35		This whole chapter falls short of adequately covering the affected environment. Any discussion of the affected environment must consider the positive impacts by the subject resource on the remainder of the environment. Livestock grazing has many positive impacts on each of the resources mentioned, but they are either ignored or not emphasized.
6-30	40		Table 2-7, Current and Potential Vegetation Production, uses S.C.S. Range Site Descriptions to quantify forage. How accurate are S.C.S. Range Sites for Carbon County where the area is characterized by a transition zone between high, shortgrass plains and basin, xerophytic forest? The Bureau has requested more local, site specific Range Sites for portions of Carbon County, but they have not been developed. Why is this?
6-31	45	9	Overgrazing is blamed for reducing the suitability of habitat for nongame wildlife, but the author offers no condition or trend data to support this claim. Such conjecture has no place in an EIS. It draws a conclusion without supporting data.
6-32	49	10	There needs to be an explanation of how Game and Fish Department derives wildlife population objective levels since the Bureau intends to use Game and Fish figures.
6-33	49	7	This paragraph and its counterpart in each section for each wildlife species is irrelevant to a Grazing EIS. Furthermore, the author does not specify if the acreages are permanently lost as habitat or temporarily removed pending completion of development.

6-8 The summary statistics will be added in the Final EIS under the Proposed Management Actions for Category M, C, and I allotments.

6-9 All Green Mountain EIS are permittees were notified by letter. However, some of the Section 15 operators never responded to our consultation attempts. One hundred percent of the Section 3 operators were consulted.

6-10 The conflicts are identified through the land use planning, public contacts, BLM personnel knowledge of the problems, and user experience and knowledge. This factor was included in the EIS because through the land use planning process and public consultations, conflicts with livestock grazing were identified that needed corrective management actions. No single factor was used to categorize an allotment into the I category.

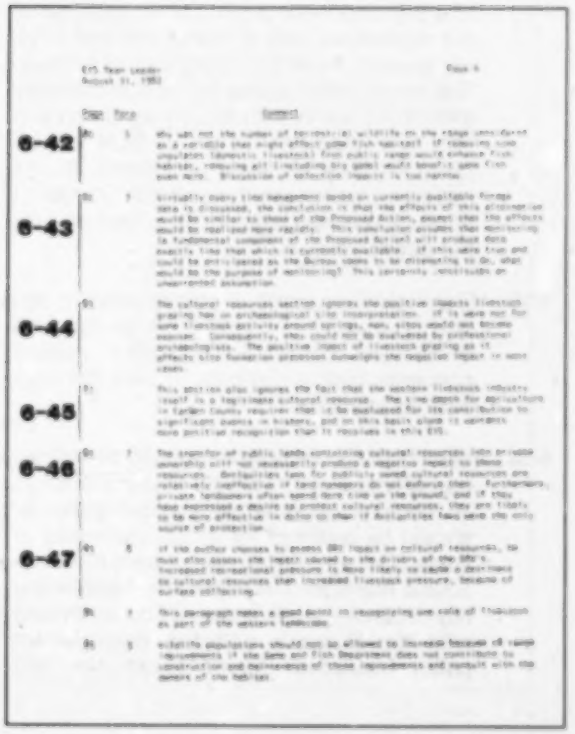
6-11 Factor 8 is based on analysis of range survey on vegetative composition. Factor 9 is based on whether there is potential for economic return on public investments. Section 15 allotments have potential for improvement but limited potential for positive economic return.

6-12 The Category I allotments in the Green Mountain EIS area were given priority because of our recognized lack of manpower and funding to work on all the Category I allotments. The range policy states that the M category allotments are in satisfactory condition and very little time and money by BLM will be spent by BLM on these allotments. It was necessary to put priorities on the Category I and not on the Cagetory M allotments for the above reasons.

6-13 "Significant" in terms of public concern can only be quantified based on large numbers of opinions. If only a few persons expressed concerns over a resource, it was not considered significant.

6-14 Intensity of monitoring, as defined by Instruction Memo No. WY-82-330 dated 5/28/82, is as follows: High intensity monitoring studies should be reserved for those allotments or areas that are of greatest concern to the resource manager. The priority for establishing high intensity study areas will be consistent with the Bureau's selective management policy Instruction Memorandum No. WO-

6-34
6-35
6-36
6-37
6-38
6-39
6-40
6-41



6-42
6-43
6-44
6-45
6-46
6-47

82-292. High intensity studies are defined as those where the level of data collected is of sufficient quality that grazing decisions can be issued to establish grazing capacities, set seasons-of-use, kind, class, and number of grazing animals by allotment. Trend studies should be read on a 5-year or longer cycle. Short-term study data (actual use, utilization, and climate) will be collected and analyzed each year in the high priority allotments. Yearly collection of these data will continue until the conflicts in an allotment are sufficiently resolved to reduce the allotment's priority. Low intensity studies will be structured to detect undesirable changes in range condition that could warrant a change in priority or category for that allotment. As manpower and money permit, these studies will consist of a minimum trend study and actual use.

Category M allotments will receive "low" intensity monitoring as defined above.

6-15 This sentence should read, "If livestock adjustments were necessary, the initial adjustment would be sufficient to achieve significant progress toward achieving the allotment management objectives for vegetation set forth in the land use plan, and after 2 years, the situtation would be reevaluated to determine the proper adjustment.

This process for adjustment in grazing use is specified in 43 CFR 4110.3-2(c) and explained in the Green Mountain Range MFP2 recommendations.

Also see text change page 11, fifth paragraph.

6-16 See text changes on those tables.

6-17 Description of Exchange-of-Use Action: Exchange-of-use grazing agreements may be issued to applicants owning or controlling land within the boundary of the allotment in which the land offered in exchange-of-use is located. Lands offered in exchange-of-use must be unfenced and intermingled with public lands. Exchange-of-use grazing agreements should benefit or work to the advantage of district grazing administration programs by consolidating range areas under the administration of the BLM and

6-48

6-49

6-50

6-51

6-52

6-53

establishing a pattern of land control and grazing operations advantageous to range management.

6-18

# OF ALLOT.	CATEGORY	FEDERAL ACRES	STATE ACRES	PRIVATE ACRES	TOTAL ACRES
32	M (20%)	68,712 (6%)	4,141 (4%)	11,128 (7%)	83,981 (6%)
85	I (54%)	1,112,398 (93%)	105,737 (96%)	115,177 (90%)	1,333,312 (93%)
40	C (26%)	12,074 (1%)	605 (.5%)	2,208 (3%)	14,887 (1%)
157	(100%)	1,193,184	110,483	128,513	1,432,180 (100%)

6-19 Viable herds are defined as enough horses to reproduce and increase naturally and to be in a healthy state.

6-20 Meadows along stream courses are actually part of the riparian ecosystem and, therefore, may be included in the fenced exclosure. Providing water for livestock would be an integral part of any fencing action on riparian areas.

6-21 See text changes on page 16. See Glossary for definition of crucial area.

6-22 Off-road vehicle (ORV) damage can occur in any allotment, regardless of categorization, and is of concern on all public lands. ORV management is one of the elements of BLM's recreation management program. The mention of ORV damage in this context is to show that ORV damage is a land use conflict with grazing use that may contribute to the need to place an allotment in the I category.

We agree that this EIS should look at the impacts of range management actions on the environment rather than impacts due to recreation proposals.

6-23 Fencing could be used to exclude livestock from newly treated areas (sprayed, seeded, etc.) from extremely important riparian habitats, from significant historic or archeologic sites, and from rare or endangered species areas. Multiple-use management often requires tradeoffs between incompatable land uses.

6-24 See text change. page 19.

6-25 The EIS states, "attempts to avoid... high site density areas would be made." This means, if one or a series of range improvements needed in an allotment could be placed away from high site density areas (instead of in high density area) and this change would not affect forage utilization or distribution, it would be proposed. As stated on page 83, second paragraph, cattle trampling and congregation can cause much damage to sites, and this is why it would be better (for cultural resources) to keep improvements and resultant heavy trampling away from high density areas.

6-26 See text changes, page 23.

6-27 Quantification of benefits would not be possible until the exact location, size, type, and design of the water development were known.

6-28 A definition of crucial habitat is provided in the Draft EIS Glossary.

Distrubance resulting from land treatments within a ¼ mile radius of sage grouse strutting grounds would have the potential to cause a complete loss of the local sage grouse population centered around that strutting ground. The Bureau is required to

consider the consequences of land treatments to protect sensitive resources if necessary. Sage grouse are not federally protected or listed as threatened or endangered species, but they are of high interest to the state of Wyoming.

6-29 The chapter describes the environment. Impacts are not discussed in this chapter. Positive impacts of livestock grazing translate most directly into increased revenues as part of the regional economy, as discussed in Chapter 3.

6-30 The use of Soil Conservation Service range sites guides was satisfactory for estimating the potential production in the Green Mountain EIS area, which includes only a small portion of Carbon County. The BLM recognizes that the guides can be improved as more data local to the EIS area become available. However, they are the best estimates available and satisfactory for estimating potential for the EIS.

6-31 This claim is based on a combination of professional judgment, on-the-ground observations of nongame wildlife in grazed and ungrazed riparian areas and a thorough review of scientific literature. The results of scientific studies that document the adverse effects of grazing on nongame wildlife in riparian areas can be found in professional journals. Studies are currently being planned in the Rawlins BLM District, which will help define the situation.

6-32 This explanation is available from the Wyoming Game and Fish Department in their comprehensive plans.

6-33 Information essential to a clear understanding of grazing problems in the EIS area is relevant to the EIS. The Council for Environmental Quality regulations require a discussion of the cumulative impacts of any action. These include those resulting from past, present, and future actions that are similar to the analyzed action. In the EIS area, surface disturbance resulting from energy and mineral development is a significant factor contributing to the current forage competition problems among livestock, wildlife, and wild horses. A part of this acreage is removed from production for an indeterminate time because of con-

struction of facilities. Remaining acreage is usually seeded to grass, which is of little value as habitat to most of the big game species in question. Restoring habitat to its former level of productivity is left to natural succession, which could take from 15 to 75 years.

6-34 Pronghorn and other wildlife species are a part of the natural environment. Thus, they are treated as part of the affected environment in this EIS. With the exception of moose, the effects of big game herbivores on riparian areas are relatively insignificant. Riparian study exclosures in adjacent resource areas and districts have documented substantial habitat improvement after livestock are excluded, even though the exclosed area continues to be utilized by big game. Livestock and wild horses are discussed in other sections of the description of the Affected Environment.

6-35 Quantification of livestock impacts on wildlife habitat is not possible considering the general nature of the Proposed Action and alternatives and current levels of data. Data collected through the monitoring efforts planned under the Proposed Action, combined with currently available forage data, should allow quantification of livestock impacts at some future date.

Wildlife uses are considered in the cumulative analysis of the impacts of the Proposed Action and the alternative on all aspects of the affected environment. Livestock are much more efficient competitors than wildlife for available forage and living space. In most allotments, the stocking rate and rate of forage consumption is much greater for livestock than for wildlife. Of the total forage consumption is much greater for livestock than for wildlife. Of the total forage demanded by all grazing ungulates in the EIS area, only about 10.3 percent is atributable to wildlife.

Aspen cutting by beaver is very localized and could not be considered significant.

6-36 Range management action impacts on the environment are analyzed in this EIS. Recreation opportunities are a part of that environment. Recreation activity impacts on other resources are not analyzed, unless

they are secondary effects resulting from range management. The earlier reference to ORV damage was related to land use conflicts that could influence the categorization of an allotment.

6-37 Robert Lichvar, the Nature Conservancy, 1603 Capitol Ave., No. 325, Cheyenne, WY 82001, (307) 634-9629

6-38 See text changes, page 69. Climax condition is defined in the Glossary.

6-39 If the assumption is made that there is a direct relationship between the number of wild horses and the aesthetic value associated with them, then we can infer that there would be a decrease in the value of those horses to society through a reduction in their numbers. We based this conclusion on that assumption.

6-40 Society, in a general sense, does gain benefit from knowing that wild horse herds exist today. If this were not the case, they would have been eliminated years ago. There are several organizations devoted to the preservation of wild horses.

Resource economics concerns itself with all resources whether they have a commercial value or not. To say that mankind does not derive a benefit from wild horse herds is incorrect. Although aesthetic value is unquantifiable to a large extent, it must nonetheless be included in an analysis of the consequences that could result from a major federal action.

6-41 Habitat potential would vary from site to site, depending on soil type, soil moistures, etc. However, habitat potential for any riparian site could be defined as the potential vegetative community that which would result from exclusion of livestock grazing for a period of 7 to 10 years.

6-42 Although wild ungulates do utilize the waters' edge, the numbers of these animals on the range were not considered to be an important variable. This is because they do not cause significant bank damage and their numbers would be unlikely to change drastically no matter which alternative is selected.

6-43 It should be clearly understood that if the Proposed Action were adopted, currently available data would be supplemented by monitoring, which could result in different conclusions.

6-44 It is the Bureau's policy to preserve and protect cultural resources on public lands. Accidental exposure of sites by cattle or any other force is not desired because the site(s) are from then on subject to natural and manmade disruption and destruction.

6-45 Page 83, first paragraph states, "Because modern operators and their animals use the same lands and many of the same resources as the prehistoric and early historic inhabitants of the region, cultural resources often occur in spots being used today." Also, in Chapter 2, page 58, under the Historic Resources section, second paragraph, "Cattle ranching was proven feasible in the latter half of the 19th century, and by the 1880's ranching was a major economic activity." Later, in the same section, fifth paragraph, "Cabins, campsites, ranches, mining communities... make up the majority of the recorded (historic) sites."

6-46 See text changes, page 83.

6-47 The question of whether surface collecting is more or less detrimental than trampling and disruption of sites from cattle is debatable—both are detrimental to a high degree, each being a different aspect of the same problem.

6-48 The availability of alternate grazing areas for wintering livestock would be a consideration before implementing this mitigation measure.

6-49 See text changes, page 86.

6-50 Nothing was said about migration of horses in this statement. The statement reads, "When livestock usage was not occurring in an adjacent allotment, gates would be left open to allow mixing of horse bands and help prevent fence destruction." Migration occurs naturally between herds areas now to some extent, regardless of fencing.

There would be no impact to private lands in the herd areas from this type of action.

6-51 A Class II survey is a series of on-the-ground field surveys that take a sample of a chosen area. They can show that a certain environmental zone can be expected to contain a high site density. (For instance, sand dunes, stream banks, river valleys, etc.) Frequently, persons familiar with an area will sense these high density areas; a Class II will validate it if it is true. The Class II is used here as a guide to locating range improvements and not as a determination of negative effects on livestock grazing.

6-52 See responses 6-23 and 6-48.

6-53 See introductory letter and text changes, Appendix 2, page 102.

7

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101-1396

ES

August 25, 1982

AUG 27 1982

Green Mountain Grazing EIS
EC #82/22

MEMORANDUM

TO: District Manager, BLM, Rawlins, WY

FROM: Field Supervisor, USFWS, Billings, MT (ES)

SUBJECT: Review of Draft Green Mountain Grazing Environmental Impact Statement

We have reviewed the subject statement; the following constitutes the comments of the U.S. Fish and Wildlife Service (USFWS). We find the draft EIS to be very general. It does not address in any specific way the environmental consequences of the proposed alternatives on rangeland resources.

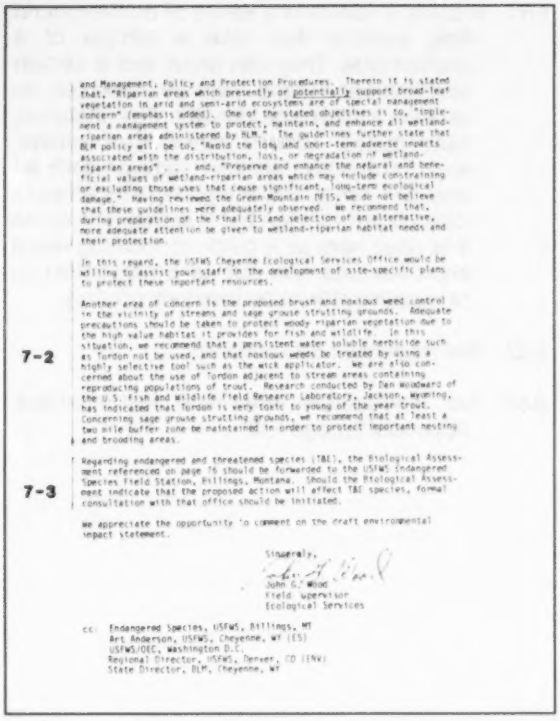
Range surveys conducted from June 1977 to October 1979 indicate that forage demands exceeded the supply (Appendix 2, part C) in 79 of the 85 allotments within the DEIS area. Consequently, we feel it is important to recommend against any further delay in implementing good grazing practices on deteriorating rangelands. We therefore recommend either the elimination of livestock grazing or implementation of grazing management that is firmly based on available forage.

7-1 A major concern to us is the existing condition of riparian-wetland habitat in the EIS area. Table 3 of the DEIS indicates that distribution of grazing animals is not satisfactory in 58 of the 85 allotments and has resulted in significant impacts to wetlands, riparian areas, and meadows. As you know, the BLM has recognized the importance of riparian-wetland habitat, and special emphasis has been given to the protection and enhancement of these areas, in terms of general policy. On February 5, 1980, the BLM published in the Federal Register (Volume 45, No. 25, pages 7689-7695), Final Guidelines, Wetlands-Riparian Area Protection

RESPONSES TO LETTER NO. 7

7-1 Please note that monitoring studies are proposed (Proposed Action) prior to making any specific grazing decisions. The intensity of monitoring is determined through categorization of allotments. The Bureau guidelines you have pointed out will be considered carefully before grazing decisions are implemented in the EIS area. Reference to possible effects of livestock grazing on wetland-riparian areas was made in several places in the EIS, especially in the wildlife and fisheries sections of the Chapter 3.

Site-specific data, upon which specific plans can be made to protect wetland-riparian areas, are currently lacking. As data are collected through monitoring efforts, grazing decisions, which should give adequate protection to these areas, will be made. As mentioned above, the BLM guidelines will be a major consideration in the decisionmaking process.



and Management, Policy and Protection Procedures. Therein it is stated that, "Riparian areas which presently or potentially support broad-leaf vegetation in arid and semi-arid ecosystems are of special management concern" (emphasis added). One of the stated objectives is to, "implement a management system to protect, maintain, and enhance all wetland-riparian areas administered by BLM." The guidelines further state that BLM policy will be to, "Avoid the long and short-term adverse impacts associated with the distribution, loss, or degradation of wetland-riparian areas" . . . and, "Preserve and enhance the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage." Having reviewed the Green Mountain DEIS, we do not believe that these guidelines were adequately observed. We recommend that, during preparation of the final EIS and selection of an alternative, more adequate attention be given to wetland-riparian habitat needs and their protection.

In this regard, the USFWS Cheyenne Ecological Services Office would be willing to assist your staff in the development of site-specific plans to protect these important resources.

7-2 Another area of concern is the proposed brush and noxious weed control in the vicinity of streams and sage grouse strutting grounds. Adequate precautions should be taken to protect woody riparian vegetation due to the high value habitat it provides for fish and wildlife. In this situation, we recommend that a persistent water soluble herbicide such as Tordon not be used, and that noxious weeds be treated by using a highly selective tool such as the wick applicator. We are also concerned about the use of Tordon adjacent to stream areas containing reproducing populations of trout. Research conducted by Dan Woodward of the U.S. Fish and Wildlife Field Research Laboratory, Jackson, Wyoming, has indicated that Tordon is very toxic to young of the year trout. Concerning sage grouse strutting grounds, we recommend that at least a two mile buffer zone be maintained in order to protect important nesting and brooding areas.

7-3 Regarding endangered and threatened species (T&E), the Biological Assessment referenced on page 76 should be forwarded to the USFWS Endangered Species Field Station, Billings, Montana. Should the Biological Assessment indicate that the proposed action will affect T&E species, formal consultation with that office should be initiated.

We appreciate the opportunity to comment on the draft environmental impact statement.

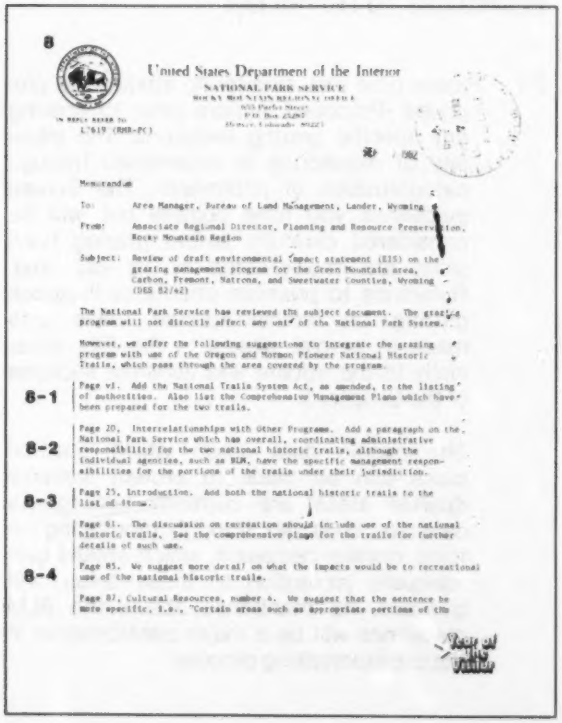
Sincerely,

John G. Rood
Field Supervisor
Ecological Services

cc: Endangered Species, USFWS, Billings, MT
Art Anderson, USFWS, Cheyenne, WY (ES)
USFWS/OEC, Washington D.C.
Regional Director, USFWS, Denver, CO (ENV)
State Director, BLM, Cheyenne, WY

7-2 Each application of herbicide on BLM public lands is thoroughly reviewed prior to implementation and is considered in an environmental analysis in which buffer strips around riparian areas are stipulated. Application techniques are rigidly controlled near sensitive areas. Persistent chemicals, such as Tordon, are used only when it can be shown there are no other more environmentally desirable chemicals or techniques that will achieve the desired results.

7-3 The biological assessment is scheduled to be sent to the Billings office before October 1, 1982. Based on the assessment, we have concluded that neither the Proposed Action nor any of the alternatives will have any effect on endangered species in the EIS area.



8

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:
L7619 (RMR-PC)

Memorandum

To: Area Manager, Bureau of Land Management, Lander, Wyoming

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of draft environmental impact statement (EIS) on the grazing management program for the Green Mountain area, Carbon, Fremont, Natrona, and Sweetwater Counties, Wyoming - (DES 82/42)

The National Park Service has reviewed the subject document. The grazing program will not directly affect any unit of the National Park System.

However, we offer the following suggestions to integrate the grazing program with use of the Oregon and Mormon Pioneer National Historic Trails, which pass through the area covered by the program.

8-1 Page vi. Add the National Trails System Act, as amended, to the listing of authorities. Also list the Comprehensive Management Plans which have been prepared for the two trails.

8-2 Page 20, Interrelationships with Other Programs. Add a paragraph on the National Park Service which has overall, coordinating administrative responsibility for the two national historic trails, although the individual agencies, such as BLM, have the specific management responsibilities for the portions of the trails under their jurisdiction.

8-3 Page 25, Introduction. Add both the national historic trails to the list of items.

Page 61. The discussion on recreation should include use of the national historic trails. See the comprehensive plans for the trails for further details of such use.

8-4 Page 85. We suggest more detail on what the impacts would be to recreational use of the national historic trails.

Page 87, Cultural Resources, number 4. We suggest that the sentence be more specific, i.e., "Certain areas such as appropriate portions of the

Parts of this Section

RESPONSES TO LETTER NO. 8

8-1 See text changes, page vi.

8-2 See text changes, page 20.

8-3 See text changes, page 25.

8-4 The Proposed Action or alternatives would not change the use of national historic trails. On this basis, we have not further discussed recreational use of these trails.

"Oregon and the Mormon Pioneer National Historic Trails would be closed to OHVs to protect cultural resources."

We appreciate the opportunity to review this EIS.

Richard A. Strait

9

WYOMING
EXECUTIVE DEPARTMENT
CHEYENNE

ED HERSCHLER
GOVERNOR

September 1, 1982

Mr. Dale Brubaker
Area Manager
BLM Lander Resource Area Office
P.O. Box 589
Lander, WY 82520

Dear Mr. Brubaker:

The Green Mountain Grazing draft environmental impact statement has been circulated for state agency review. Copies of agency comments are enclosed for your consideration and use.

9-1 It is my understanding that factors such as estimated grazing capacity, initial stocking levels and subsequent grazing adjustments, if any, will be based on additional monitoring, operator consultation, allotment management plans and the final Rangeland Program Summary. I request that the state be kept fully apprised of these activities. There must be adequate notice and opportunity for direct state and local involvement in these activities and the related decision-making process. In particular, the state, the affected operators and other interested entities must have direct input to the draft Rangeland Program Summary. This document will contain the proposed land use planning objectives and grazing adjustment decisions, so there must be opportunity for extensive review and comment.

I note the 93 percent of the acreage in the EIS area is in Management Category I where the principal management objective is to improve resource conditions and reduce or eliminate resource conflicts. I suggest that the BLM immediately take action to address the latter by reducing the number of "wild" horses from the existing population (1,421 horses) to, at most, the number supported by currently available forage data (447 horses). These horses should also be restricted to the areas in which they were found prior to passage of the 1971 Wild Free-Roaming Horse and Burro Act.

RESPONSES TO LETTER NO. 9

9-1 BLM will ensure state and local involvement in the decisionmaking process. The Rangeland Program Summary will be distributed to all those receiving a copy of the Draft EIS as well as anyone else requesting a copy. It will then be updated as necessary.

9-2 Some actions will be undertaken before all planned monitoring is completed.

The effects, benefits, and disadvantages of these actions will determine which of these actions will be accomplished.

9-3 Impacts to ranching operations will be carefully considered throughout the consultation decision processes. These impacts were considered in the Socioeconomics section of the EIS.

Mr. Dale Brubaker
September 1, 1982
Page 2

The forage allocation figures in the document indicate that the current wild horse population consumes 76 percent as much forage as the current wildlife population. Reducing the wild horse herd by some 70 percent, as I have suggested and the forage data supports, would free up significant forage for allocation to livestock and wildlife. Reduction of the current wild horse population must be given a high priority in the area's overall grazing management program.

9-2 Improvement of range conditions through the implementation of range improvement structures and practices should also be a high priority. Creation of new water sources by constructing reservoirs, troughs and spring developments and certain vegetation manipulation practices can be mutually beneficial to both livestock and wildlife. While it is agreed that additional monitoring and consultation is necessary to justify livestock adjustments, implementation of multi-purpose range improvements, where benefits are obvious, should not be held up until long-term monitoring is completed.

Members of the Wyoming State Rangeland Committee have expressed concern over previous Bureau proposals to fence large amounts of existing wetland or riparian areas that livestock have traditionally used. I believe this concern is well founded. Creation of new wetland and riparian areas with concurrent fencing before livestock became dependent is a much more reasonable and responsible approach.

9-3 The document indicates that grazing opportunities on public lands contribute 42 percent of the income for the average ranch in the area. Moreover, licensed AUMs add to the capital value of a ranch and affect the ability of a rancher to borrow money as well as the resale value of the rancher's property. While a BLM grazing allotment may provide only a certain percentage of a rancher's total livestock forage requirements, a significant reduction or loss of this allotment could obviously impact his entire ranching operation. Such potential impact must be determined through direct consultation and be fully considered in any future grazing allotment decision.

Thank you for the opportunity to review and comment on this document. Please keep me informed of the progress in this effort.

Very sincerely,

EH:pcl
Enclosures

10

THE STATE OF WYOMING — ED HERSCHLER, GOVERNOR

Game and Fish Department

CHEYENNE, WYOMING 82002

W. DONALD DEXTER, DIRECTOR

August 27, 1982

EIS 164/LI BLM Green Mountain Grazing EIS. SIN 82-135.

Mr. Dale Brubaker
Area Manager
BLM Lander Resource Area Office
P.O. Box 589
Lander, Wyoming 82520

Dear Mr. Brubaker:

We have reviewed this EIS and offer the following comments for your use in making the Final document more complete and accurate in considering wildlife resources.

SPECIFIC COMMENTS:

1. Minor changes in maps 2-4 through 2-8 which are needed to reflect more recent data from the southern portion of the resource area.

10-1 Alt: a "severe winter relief range" should be delineated between the Cottonwood and Cooper Creek drainages north of Green Mountain along U.S. Highway 287.

Mule Deer: yearlong habitat needs to be added for several areas in the Sweetwater Rocks and along both Cyclone Rim and Bison Basin.

Pronghorn: maps in the EIS have omitted the important winter range for the Red Desert antelope herd in the Lost Creek drainage south and west of Crooks Mountain.

Distribution overlays for the north part of the area have been updated since 1980. Changes needed in maps 2-4 through 2-8 are attached. These changes include addition of elk critical winter, yearlong, and severe winter relief ranges in the western part of the EIS area; addition of general winter/yearlong, summer, and yearlong deer range; expansion of the Hall Creek/Cedar Draw antelope restricted winter range; deletion of the two restricted winter ranges east of Hall Creek/Cedar Draw; adjustment of some of the antelope movement patterns; additions to sensee critical/yearlong range; addition of seven sage grouse strutting grounds and deletion of another. Locations of

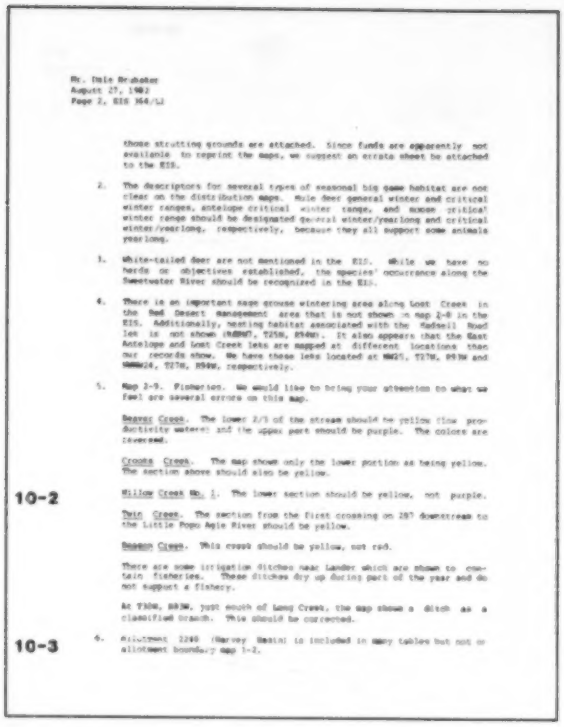
RESPONSES TO LETTER NO. 10

10-1 Careful evaluation indicates that the change in the ranges would have no effect on the analysis presented in Chapter 3 of the Draft EIS. Nevertheless, operational maps in the Lander Resource Area office will be updated to reflect these changes. These maps will then be available when monitoring and grazing decisions take place.

10-2 The Wyoming Game and Fish Department's 1977 stream fishery classification map was used as our map reference. It was the best information available at the time. However, the maps will be updated.

10-3 It is not possible to make map changes for the Final EIS. The legal description of allotment 2240 is: S½SW¼, Section 2; S½, Section 14; S½S½, Section 22; N½SW¼, Section 23; N½NW¼, SE¼NW¼, Section 24; S½, W½SE¼, Section 26; E½E½, NW¼NE¼, Section 27; T. 13 N., R. 100 W.

10-4 See text changes, page 16



Mr. Dale Bruchter
August 27, 1982
Page 2, EIS 364/LJ

those strutting grounds are attached. Since funds are apparently not available to reprint the maps, we suggest an errata sheet be attached to the EIS.

2. The descriptors for several types of seasonal big game habitat are not clear on the distribution maps. Mule deer general winter and critical winter ranges, antelope critical winter range, and moose critical winter range should be designated general winter/yearlong and critical winter/yearlong, respectively, because they all support some animals yearlong.

3. White-tailed deer are not mentioned in the EIS. While we have no herds or objectives established, the species' occurrence along the Sweetwater River should be recognized in the EIS.

4. There is an important sage grouse wintering area along Lost Creek in the Red Desert management area that is not shown on map 2-8 in the EIS. Additionally, nesting habitat associated with the Hadsell Road lek is not shown (NE¼NE¼, T25N, R94W). It also appears that the East Antelope and Lost Creek leks are mapped at different locations than our records show. We have those leks located at NW¼, T27N, R93W and SW¼SE¼, T27N, R95W, respectively.

5. Map 2-9. Pioneer. We would like to bring your attention to what we feel are several errors on this map.

Beaver Creek. The lower 2/3 of the stream should be yellow (low productivity waters) and the upper part should be purple. The colors are reversed.

Crooks Creek. The map shows only the lower portion as being yellow. The section above should also be yellow.

10-2 Willow Creek No. 1. The lower section should be yellow, not purple.

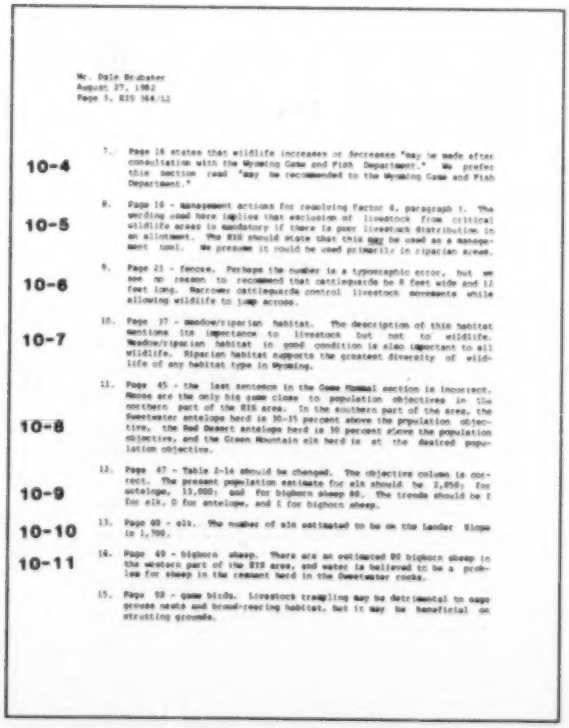
Twin Creek. The section from the first crossing on 287 downstream to the Little Popo Agie River should be yellow.

Beacon Creek. This creek should be yellow, not red.

There are some irrigation ditches near Lander which are shown to contain fisheries. These ditches dry up during part of the year and do not support a fishery.

At T30N, R93W, just south of Long Creek, the map shows a ditch as a classified branch. This should be corrected.

10-3 6. Allotment 2240 (Harvey Basin) is included in many tables but not on allotment boundary map 1-2.



Mr. Dale Bruchter
August 27, 1982
Page 3, EIS 364/LJ

10-4 7. Page 16 states that wildlife increases or decreases "may be made after consultation with the Wyoming Game and Fish Department." We prefer this section read "may be recommended to the Wyoming Game and Fish Department."

10-5 8. Page 16 - management actions for resolving factor 6, paragraph 1. The wording used here implies that exclusion of livestock from critical wildlife areas is mandatory if there is poor livestock distribution in an allotment. The EIS should state that this may be used as a management tool. We presume it could be used primarily in riparian areas.

10-6 9. Page 23 - fences. Perhaps the number is a typographic error, but we see no reason to recommend that cattleguards be 8 feet wide and 12 feet long. Narrower cattleguards control livestock movements while allowing wildlife to jump across.

10-7 10. Page 37 - meadow/riparian habitat. The description of this habitat mentions its importance to livestock but not to wildlife. Meadow/riparian habitat in good condition is also important to all wildlife. Riparian habitat supports the greatest diversity of wildlife of any habitat type in Wyoming.

10-8 11. Page 45 - the last sentence in the Game Animal section is incorrect. Moose are the only big game close to population objectives in the northern part of the EIS area. In the southern part of the area, the Sweetwater antelope herd is 30-35 percent above the population objective, the Red Desert antelope herd is 30 percent above the population objective, and the Green Mountain elk herd is at the desired population objective.

10-9 12. Page 47 - Table 2-16 should be changed. The objective column is correct. The present population estimate for elk should be 2,050; for antelope, 15,000; and for bighorn sheep 80. The trends should be I for elk, D for antelope, and I for bighorn sheep.

10-10 13. Page 48 - elk. The number of elk estimated to be on the Lander Slope is 1,700.

10-11 14. Page 49 - bighorn sheep. There are an estimated 80 bighorn sheep in the western part of the EIS area, and water is believed to be a problem for sheep in the remnant herd in the Sweetwater rocks.

15. Page 58 - game birds. Livestock trampling may be detrimental to sage grouse nests and brood-rearing habitat, but it may be beneficial on strutting grounds.

10-5 See text changes, page 16

10-6 See text changes, page 23

10-7 See text changes, page 37

10-8 See text changes, page 45

10-9 See text changes, page 47

10-10 See text changes, page 48

10-11 See text changes, page 49

10-12 See text changes, page 105

10-13 items number 20 and 21. A more detailed discussion of impacts to nongame wildlife and specific habitat types is not possible considering the general nature of the Proposed Action and the alternatives. Site-specific data on nongame wildlife and the many habitat types in the EIS area is unavailable.

However, the results of monitoring should help provide such data so that nongame wildlife needs and the importance of various habitat types will be given proper consideration when range management decisions are made.

16. Page 66 states that management alternatives (e.g., fencing, water development, and vegetation conversion) would cause a short-term reduction in vegetative cover and soil infiltration, resulting in lower water quality due to increased sedimentation. In those cases where there is more than one choice of methods for obtaining the same desired result (e.g., use of herbicides vs. plowing and burning) the choice which causes the least amount of damage to watersheds and water quality should be selected. Buffer zones should be provided around riparian areas when planning vegetation conversions, unless the plan is to enhance riparian vegetation.

17. Page 87 - Mitigating Measures - Fisheries. Fencing riparian areas to mitigate impacts to fisheries is a good point and should be stressed during further planning stages. An area that we have a specific concern with is Big Atlantic Gulch (SE1/4, S16, T10N, R100W). As part of a past timber sale, trees were accidentally cut around the spring after a request by the Wyoming Game and Fish Department that they be left. The area was reseeded but was not successfully re-established. It has since been reseeded a second time. To prevent further damage to the riparian vegetation and encourage reclamation we request that the area be fenced to the Miner's Delight road crossing.

10-12

18. Page 105 - Appendix 2, Part B - Current animal numbers and forage demand. The EIS allotment map shows pasture 2011 encompassing the area northwest of Crooks Mountain towards Jeffrey City. Unless a portion of the pasture is missing from the map, we seriously doubt the area supports two moose and six bighorn sheep.

10-13

19. Page 116 - Appendix 2, Part I - Animal numbers and forage supply. When Tables B and B are compared, it appears that the Game and Fish Department sets population objectives to consume every pound of available forage. In fact, our objectives are well below what the range can support. This table shows what is allocated to wildlife, not what is available. Therefore, we suggest the term "forage allocation" would be better than "forage supply".

20. The EIS has concentrated on game species. It should contain some discussion of possible effects of the proposed grazing program on nongame wildlife. More complete information on species distribution and habitat preferences is present in the Avian Atlas. Some analysis of these data might emphasize the need for special management and monitoring of habitat for priority species.

21. Acreage estimates for various habitat types and an estimate of possible impacts on these types should be included in the EIS.

GENERAL COMMENTS:

Elimination of livestock grazing is not a feasible alternative, nor is it desired. That would eliminate the option of using grazing as a management tool. The enhanced livestock grazing option would probably decrease range quality, and might cause severe damage to the range. No action is also not a feasible option because we believe this would result in decreasing wildlife populations. The forage allocation option may theoretically be best, but would require much better data than we are currently able to collect, and would require doing so allotment by allotment, rather than by herd unit. If management of the grazing program remains as described in the EIS, the proposed action, which includes monitoring and an allotment-by-allotment improvement, is our preferred alternative.

However, the alternative to implement management programs based on currently available forage data could result in immediate action to prevent loss and further deterioration of riparian habitat and related stream habitat. With this alternative there would not be the delay time while monitoring is being done, as there is with the proposed plan.

Possibly a combination of the Proposed Action and Management Based on Currently Available Forage Data would be best on critical riparian areas. Work could begin immediately to improve some of the range and riparian areas that are in the worst condition, while at the same time monitoring could be conducted to determine future actions in other areas.

In general, we believe BLM personnel have done a good job of designing a grazing system for the area. Please contact us if we may be of further help on this project.

Sincerely,

Francis Peters

FRANCIS PETERS,
ASSISTANT DIRECTOR, OPERATIONS
WYOMING GAME AND FISH DEPARTMENT

FP:SBM:al

cc: State Planning Coord.
cc: Fish Division
cc: Game Division

11

THE GEOLOGICAL SURVEY OF WYOMING

August 24, 1982

State Planning Coordinator
Wyoming State Clearinghouse
[illegible]
Cheyenne, WY 82002

Dear Sir:

We have reviewed the Green Mountain Grazing EIS report and have only the enclosed maps to submit as comments to the proposed grazing activity. These maps show localities where active or stabilized sand dunes are present within the proposed grazing area.

11-1 All of the dune areas are classified under the GP unit designation (Ayensite 6) where erosion potential is moderate to high. Increased grazing may remove vegetation cover and cause reactivation of stabilized dunes.

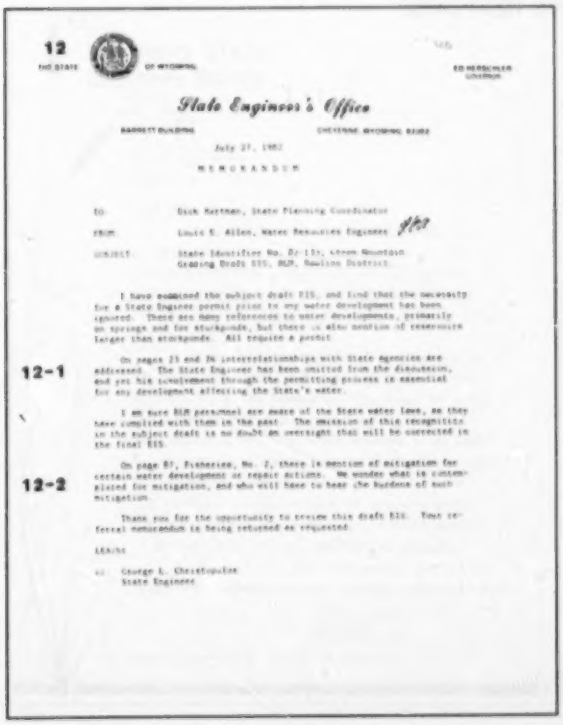
Sincerely,

Cindy L. Boyd
Wyoming Geological Survey
Environmental Section

CLB/sm
Enclosures

RESPONSE TO LETTER NO. 11

11-1 Thank you for the maps. This information will be added to the Bureau's data base in the EIS area.



12

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

State Engineer's Office

BARRETT BUILDING CHEYENNE, WYOMING 82002

July 27, 1982

MEMORANDUM

TO: Dick Hartman, State Planning Coordinator

FROM: Louis E. Allen, Water Resources Engineer

SUBJECT: State Identifier No. Gr-115, Green Mountain Grazing Draft EIS, BLM, Rawlins District

I have examined the subject draft EIS, and find that the necessity for a State Engineer permit prior to any water development has been ignored. There are many references to water developments, primarily on springs and the Muddy, but there is also mention of reservoirs larger than stockponds. All require a permit.

12-1 On pages 25 and 26 interrelationships with State agencies are addressed. The State Engineer has been omitted from the discussion, and yet his involvement through the permitting process is essential for any development affecting the State's water.

I am sure BLM personnel are aware of the State water laws, as they have complied with them in the past. The omission of this recognition in the subject draft is no doubt an oversight that will be corrected in the final EIS.

12-2 On page 87, Fisheries, No. 2, there is mention of mitigation for certain water development or repair actions. We wonder what is contemplated for mitigation, and who will have to bear the burdens of such mitigation.

Thank you for the opportunity to review this draft EIS. Your referral memorandum is being returned as requested.

LEA/kt

cc: George L. Christopulos
State Engineer

RESPONSES TO LETTER NO. 12

12-1 See text change, page 22

12-2 The mitigation would be to make reservoirs of sufficient depth and size to support stocked fish year-round. BLM would bear the costs of construction. Maintenance costs would probably be shared between BLM and the livestock operator for a reservoir of this type.

13

Water Development Commission

NO RESPONSE

14

United States Department of the Interior

NO RESPONSE

15

Hugh Jones Realty, Inc.

September 1, 1982

Mr. Dale Brubaker
Area Manager
Bureau of Land Management
Box 589
Lander, Wyoming 82520

Dear Dale

I overlooked the letter on the first page of the B.L.M's Environmental Impact Statement Book I received about 4 weeks ago. According to the letter we should have our answer in by September 1, 1982

Because of the Labor Holiday season and my overlooking the deadline, there is no way I can study the draft by tomorrow. I will make every attempt to study it and give you my comments as fast as possible, but it will take at least two weeks.

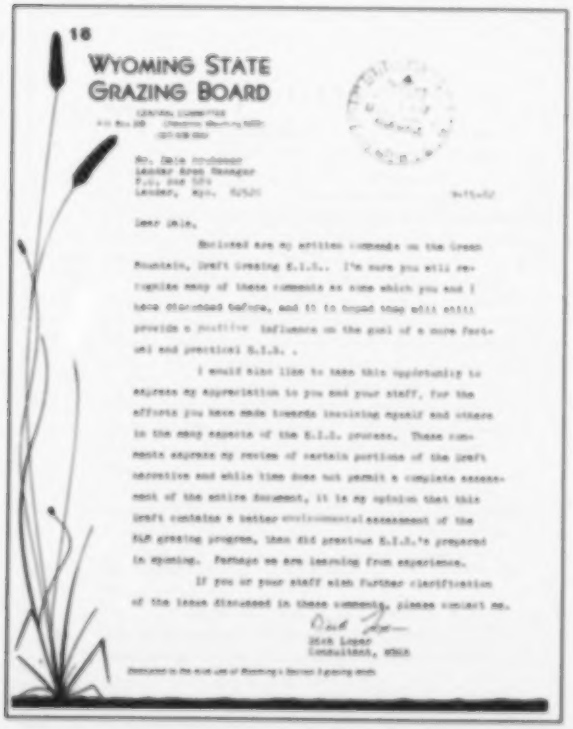
Thanks Dale,

Hugh H. Jones
HUGH JONES REALTY, INC

FHJ:ss

NO RESPONSE

16



WYOMING STATE GRAZING BOARD

Mr. Dale Brubaker
Lander Area Manager
P.O. Box 589
Lander, Wyo. 82520

Dear Dale,

Enclosed are my written comments on the Green Mountain, Draft Grazing E.I.S.. I'm sure you will recognize many of these comments as some which you and I have discussed before, and it is hoped they will still provide a positive influence on the goal of a more factual and practical E.I.S. .

I would also like to take this opportunity to express my appreciation to you and your staff, for the efforts you have made towards involving myself and others in the many aspects of the E.I.S. process. These comments express my review of certain portions of the draft narrative and while time does not permit a complete assessment of the entire document, it is my opinion that this draft contains a better environmental assessment of the BLM grazing program, than did previous E.I.S.'s prepared in wyoming. Perhaps we are learning from experience.

If you or your staff wish further clarification of the issues discussed in these comments, please contact me.

Dick Logan
Consultant, WSGA

Letters 16, 17, 18, 19, and 20 were received approximately 2 weeks after the closing of the public comment period, when the EIS was going into final printing. Consequently, no responses could be included. However, these comments will be considered in the subsequent grazing decisions in the Green Mountain area.

Note: The three attachments to Letter No. 16 concern future actions in the Green Mountain area and are not pertinent to the Green Mountain Draft EIS. Therefore, these attachments are not included.

[illegible] Loper
[illegible]
P.O. Box [illegible]
Lander, Wyo. 82520
for
W.S.G.A.

[illegible]omments to the Draft
[illegible]rest Mountain E.I.S.

Page S - 1

The first paragraph states that "this document will to used to determine future grazing management, . . . ". This sentence should more [illegible]say that this document will provide the[illegible] assessment of possible grazing management actions because an E.I.S. is not [illegible] to be a decision document.

At the top of the second column, change the last sentence to read, "Under the Proposed Action, present management would continue until [illegible] monitoring data were available to support the type of management decision necessary in the allotments.

The Elimination of Livestock Grazing Alternative is not required by the N.E.P.A. or the C.E.Q. and it represents an impractical and perhaps illegal alternative considering the multiple use mandate directed by the Organic Act of 1897. Discussions in this alternative are therefore academic and often nothing more than speculation. The real impacts of no livestock grazing on Public Lands are not known, and can not be determined, because that situation hasn't existed for over 100 years.

The No Action alternative, as defined on page S - 1, is not a practical alternative. It isn't feasible to "freeze" in place a dynamic industry such as livestock. As described, this alternative should more appropriately be called, "no change", or

the "Present Situation".

Page S - 2

The "Management Mood of Currently Available Forage Data" is also assumed or misdefined, however one looks at it. The data base in this alternative is the modified S.T.I.M. - forage allocation process only. Other resource data collected prior to 1978 is available to the Bureau for use in this alternative, but wasn't used. Please explain why all credible inventory and monitoring data available to the BLM wasn't used in this alternative. Also, please explain why the computerized S.T.I.M.- forage allocation data was used at all, when the quality and reliability of the outputs have never been tested to the satisfaction of the BLM or the rest of the Range Profession.

Table S - 1, pages S - 5 and 6 show too much bias towards the attitude that removal of livestock from the Public range would produce overwhelming positive benifits to the other multiple uses. This table sets the tone for too much of the discussion in the draft and it is not an objective assessment of the real impacts of the alternatives on the multiple uses.

Page 1

The second paragraph states that BLM committees, etc., were consulted during the process. While it is my opinion that the Lander Area office did a better job of getting public input to the E.I.S. process than in previous E.I.S. efforts in wyoming, Section 8 of the Public Rangelands Improvement Act requires a process of consultation, co-ordination, and co-operation on these types of programs and the Bureau has a long ways to go before the full intent of that Section of the P.R.I.A. is implimented.

(3)

The first goal on page 1 isn't realistic. Their are presently too many numbers of competing livestock, wildlife, and horses on the Public Lands. Since the priority should be food and fiber production, present horse and wildlife numbers should not be the goal of this E.I.S. area.

In the second column, second paragraph, the narrative states that the goal in the I category is to "improve their unsatisfactory condition." Some I category allotments are in that category for reasons other than unsatisfactory condition, but this narrative suggests otherwise.

Page 2

The narratives discussing the characteristics of the various categorys, imply that allotments in these categorys have all of the characteristics described. This is not so. The narrative should state that allotments in these categorys may have one or more of the characteristics of the category, but not all.

Page 5

The draft E.I.S. shows that 91 percent of the acres in this E.I.S. area are classified in the I category, but a review of existing resource data for this area does not indicate resource problems of that magnitude, I would like to recommend that the Final E.I.S. show the number of acres for each factor for each allotment, so that the size of the "problems" in each allotment can be taken in perspective. Also, factors 1,2,3,7,8, and 9, are based on data generated through the computerized modified S.V.I.M.-Range allocation process. This process is still untested to the satisfaction of BLM and a consensus of the rest of the Range Pro-

(4)

fession and is, therefore, an inappropriate data base for such a classification process.

Also, please indicate in the Final E.I.S., which factor is documented by acceptable data, and which are speculation or perceived, but not proven, to be true in that allotment.

Was the division of I allotments into priority groups a process that complied with the Congressional intent expressed by Section 8 of the F.R.I.A.? If not, please explain how the allotments were prioritized in this E.I.S. .

The narrative at the end of page 5 stresses the importance of monitoring and that recognition is applauded. Although we recognize that the local Lander BLM office had very little control over this issue, our assessment of the process used by the Bureau to conduct monitoring studys in this E.I.S. area during the 1982 field season, leaves alot to be desired. Rather than describe what we don't like about last field season's monitoring program on the Green Mountain E.I.S. area, my comment is to implement the monitoring process shown in attachment 1 to these comments.

Page 11

As stated in the narrative, grazing decisions should only be made after adequate information is available and only after a meaningful coordination, cooperation, and consultation process has occured with the permittee. We recommend the Bureau follow the processes set forth in Attachments 2 and 3 of this Public comment.

In the last paragraph, column 1 on page 11, the priorities for spending range improvement funds, spacially 8100 type funds, should be set by input from the Grazing Advisory Board, and

not by an in-house BLM decision to only fund projects in the I catagory. If livestock adjustments were necessary, the timing and size of the adjustment should be a decision arrived at through a process outlined in Attachment 2 of this Public comment, not an arbitrary 50% as stated in this E.I.S. . Current Grazing Regulations, Section 4110. 3-2. as amended, provide the phased adjustment guidence narrative on this issue.

Change the time frame for the E.F.S. on I catagory lands from the 5 months stated on page 11 of this E.I.S. Draft, to 12 months, to comply with BLM policy on this point.

Page 15

Where do the Forage Supply numbers come from in table 1-8? If they came from a one-time inventory, include a narrative in the Final E.I.S. which qualifies the value and useful purposes of that data, if any.

Why is there even a Forage Supply column in Table 1-8? The title says Forage Demand.

Page 16

Since BLM's budget will not allow them either the money or manpower to intensively manage 91% of the acreage in this E.I.S. area, and since no where near 91 percent of the E.I.S. area needs intensive management different than it now has, we recommend that the Lander BLM office reassess the classification of those allotments now in the I catagory and only classify allotments into the I when there is documented resource problems currently of a magnitude to justify calling special attention to them. The Lander office has done themselves and the livestock industry of this area, an injustice by claiming that 91% of the E.I.S. area should be in

the I category. Resource conditions are not that bad and the reliable data currently available bears this out.

Item 2 of the Management Actions for C category Lands implys that the remedy for changes in resource conditions is livestock adjustments. It would be more appropriate to try and evaluate why the resource conditions were changing before predicting the management action necessary to reverse the change. We continue to hope that the BLM will quit looking at adjustments in livestock numbers as the primary management action when a resource problem exists, we would rather see a narrative in the E I S. that says the BLM will first evaluate the problem and then in c c c with the permittee look at the entire range of management actions which could possibly solve the problem. Some of our western ranges are understocked but poorly managed, and a continued philosophy of first adjusting numbers will not solve that problem.

For C category lands consider long term surface leasing as a possibility for these lands.

The narrative concerning I category lands on page 16 suggests that all I lands have resource condition problems and conflicts. This is not true and the narrative should be changed to reflect reality, not a biased perception.

The narrative discussing the management actions necessary to "solve" factors 1, 2, and 3 only discuss livestock adjustments as the management tool. This narrative should discuss the entire range of management actions which might solve these Factor problems, should they actually exist. Verbal discussion with Lander Area BLM range men do not always reflect this emphasis on cuts in numbers. The narratives in this E I S should reflect the same philosophy expressed in verbal communications.

The second and third management actions for solving a Factor 4 problem are incorrect and they reflect a strong bias towards wildlife over livestock that is not justified in the literature on how to manage riparian areas and meadows. The present narrative discusses one of the possible management actions, but certainly not the only one available for use. Since private individuals own or control over 90 Percent of the water locations in Wyoming, the BLM should realize that the potential for backlash impact on Wyoming's wildlife would be severe and negative should the Agency seriously consider excluding livestock from selected wildlife habitat areas. The multiple use concept by law, dictates

that the public land areas be shared among the legitimate multiple uses.

Table 1-9 on range readiness is too conservative on the stages of phenology which must be obtained before livestock are allowed to graze an area. An area can be turned into prior to grasses heading out without hurting the plants, especially if the area is in some form of deferred system. This table doesn't reflect the flexibility which comes from grazing systems and should be changed to reflect current state of the art on this subject.

Key species should not be determined until after the allotment goals and objectives have been decided through the c.c.c. Process.

The Range Readiness map on page 18 may represent the situation in one year, but with the variation in growing seasons experienced in the Lander E I S. area from year to year, it is impossible to predict an average year's situation. This subject should be decided through the c.c.c. process shown in Attachment # 1 of these Public comments, not during the preparation of the E.I.S.

Page 19

Management action 5 appears to be very one-sided. Why not consider the alternative of excluding the "other land uses" instead of livestock, if that action would also solve the problem?

Although we recognize the local BLM office had no

(9)

choice but to include this Alternative in the E I S
The Elimination of Livestock narrative on this page is so full of misstatements of predicted results that it doesn't deserve detailed comment. Aside from the knowledge that the "benefits" to wildlife predicted in this narrative would not occur as written, Wyoming State Law requires the landowner who doesn't want cattle on his property to fence them out, not the other way around. This alternative should not be in the E I S unless the real results of such an action were objectively evaluated

Page 20

The Management Based on Available Forage Data Alternative is based on outputs determined with a computerized process that has virtually no support in the Range Science community outside the BLM. The basic concepts and theories in the computerized process have not been properly field tested by the BLM or anyone else. So it is impossible at this time to accurately comment on the merits or deficiences of this Alternative except to say it shouldn't even be in the E I S. At the very least, the BLM should include a narrative stating the above facts presented in this Public Comment. The general public should be adequately informed about the untested quality and interpretations of this information.

(10)

Page 22

The entire narrative on Standard Operating Procedures is negative in tone concerning livestock management. For example, why aren't meadows monitored to determine the impacts of horses and wildlife as well as livestock? Why doesn't the Bureau exert more pressure on the Game and Fish Department when wildlife numbers are in excess of their carrying capacity? The excess that the BLM only controls the habitat, not the numbers doesn't seem to be equal treatment. BLM doesn't own the cows either, but BLM control of the Public habitat gives the Agency the right to control cow numbers and livestock carrying capacity.

Page 19

The narrative on condition and trend is good as far as it goes. The assessment that 70-80 percent of the E I S area is in Fair to low-good ecological condition implies an unsatisfactory situation and doesn't tell the Public anything about the forage situation. Since ecological condition doesn't necessarily reflect forage situations, the Final EIS should describe the overall forage quantity and quality situation in the E I S area.

Page 40

Table 2-7 is misleading because the recent resource inventory used vegetation types, not range sites, as the base mapping unit. Therefore, the S.C.S. guides can't be used because they don't predict potential on vegetation types.

(11)

Page 43

In the Nonsame wildlife narrative, is their proof that overgrazing has adversely affected vegetation diversity and habitat, and if so, what did the overgrazing? Could it have been excess horses?

In order to be fair, shouldn't permittees have been contacted for their input to a table on objective number for livestock in the E I S area?

The narratives on competition between livestock and wildlife often overstate their adverse relationships These animals are more compatible that pages 48 through 54 seem to state.

The narrative on monitoring in the final E I S should reflect that the main purpose for a monitoring program is to provide data which will tell the permittees and BLM if the present management program is accomplishing the goals and objectives of the allotment. Range Studies should not be used to verify pre-conceived ideas based on a one time inventory.

Page 61

We object to the use of data shown in Appendix 2 for any purpose that might influence an evaluation of the present or future situations, because this data was generated using an untested technical procedure of proven unreliability. Data from any source, should be required to meet minimum quality standards before the Bureau calls it "best available data". Data in Appendix 2 certainly has not yet been shown to meet minimum standards for

(12)

quality and consistant reliability.

Page 65

Impacts from implementing the Management Based on Currently Available Forage Data Alternative would certainly Not be the same as the Proposed Action unless the BLM actually intends to reduce livestock to the levels stated in the M B on C A F D alternative Please fully explain these apparently very serious misstatements on pages 65 and 67.

Page 73

If the entire range of possible management actions feasible on I category lands were used, the available forage line would not stay so low for so long. This graph suggests that results of good range management take a long time to show results. This is not true if we use all the tools available to us, such as spraying, burning, etc.

Page 74 a

The option of buying hay to replace lost AUM's is very seldom feasible or practical and the economic impacts of the loss of AUM's go far beyond net revenue changes, even in the short term. These sections on environmental and economic impacts need a complete re-write if reality is to be in the final E I S. This is not to suggest that all of the existing narrative is all wrong, only that a lot of bias and inaccuracies are present. If time does not now permit such a re-write,

(13)

we would suggest a process similar to Attachment # 3 of this Public comment to insure quality decisions based on quality data obtained through the C.C.C. process outlined in Attachment # 3

Page 102

We object to the use of forage supply data in this Appendix when BLM has said on page 61 that forage supply equals forage demand on M and C category lands. The Tables in this Appendix do not support that assumption and since the forage supply data was obtained using an unreliable methodology, all references to forage supply using this methodology should be removed from the Final E.I.S. If forage supply data is necessary in this E.I.S., it should only come from using State of the Art procedures such as the standard weight estimate method described in the BLM manual or the SCS method where it could be used

Page 139

The glossary is severely deficient in the number of important terms that need definition. The Society for Range Management office in Denver can provide a good list of Range Management terms and their definitions. This publication should be included as an Appendix to the Final E.I.S.

Thank you for your review of these comments. Please contact me if I can further clarify these remarks.

Dick Loper

Attachment 3

17

Comments on Four Corners
Coal-fired EIS

Dennis Sun
Sun Land & Cattle Company
Dove Creek, Colorado
February 12, 1980

My comments concerning the Cross Country XC's will be limited to the primary athletics provided by Alta Sun Land and Cattle Company in Okla and Stock Road Company and owned by Sun Road Hill athletics are numbered as 2003 Ability Park 2004 Sun Com. Parker, 2019 Cowie Court, 2020 Cotter and Parker and 2021 Cotter Court Parker

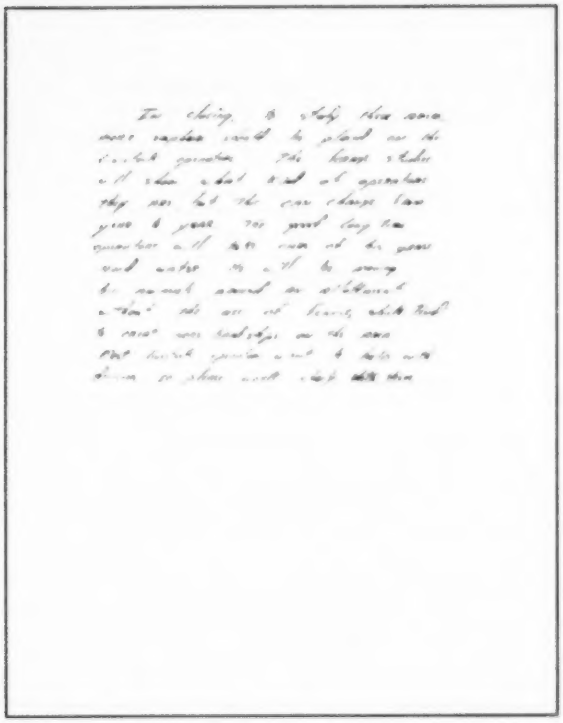
It must be noted at this time that the water supply for these cross country facilities are located primarily on the east side of the property although the elevation of Cotter County there can also be made multiple use crossing arrangements

Under the XC Type of the five athletics we in the I category are told that the only athletics which should be made the I interest is 2003 Ability Park the other athletics and 20 will should be a a or category Under our arrangement with the parker on just used a lot fuel and water Sun parker 2021 is sometimes just used every other year the state

will show that annual rain fall and in some years rain fall is much greater over this athletics than the rest of the XC's In athletics 2018 this year we put up around 650 bales of hay on ground that are not irrigated All grassy rain from rain fall

In athletics 2019 and 2021, there were brought together a couple athletics with In athletics 2021 there must a road for the parker also All the paths are called the parker In athletics 2019 there we are forced for these parker Paths then athletics were changed to an category

The ability Park athletics (2003) paths should be in the I category because of its use and condition has changes The biggest factor is known The low and swamp land They have to be cut down The the of Changes that a down rain in one month a gravity flow 900 the ground water and that water flow is good condition for water Under the condition the home always wet A reduction in surface problems would also help the athletics



18

Hawkins Route- Box 99
Lander, WY 82520
September 13, 1982

To: Lander B L M Area Manager, Dale Bruchaker

I am writing this letter to point out some inaccuracies and problems in the Green Mountain Grazing EIS. My comments are mainly on the areas we are concerned with; since I have specific knowledge of these. My comments are from the perspective of our grazing situation.

On page 13, Table 1-5, it states Allotment #1705, Myers Fenced Pasture has a Season of Use- C: 4/3 to 11/15 and H: 4/1 to 12/15. This is wrong, because there are never horses in this pasture and cattle are in there only during April. I don't know if this error has caused #1705 to be in the I category or not, but it should be checked.

On page 17, Table 1-10, I feel the number of wild horses in the Bishpan Butte herd is inventoried low at 87. On round-up this fall I personally counted 74 horses in one herd and later 3 herds of 8, 10, and 12. This totals 106 head on the east side of the Sand Draw road, and there are 10 more head on the west side of the road. This also brings up another problem. The new Sand Draw road cuts off 1/3 of the Bishpan Butte Wild Horse area, but there are not 1/3 of the horses on the west side of the road. As you can see there is about 1/10. This puts excessive pressure on the range on the east side of the road where the majority of the horses are.

On page 45, under Wildlife- Nongame Wildlife, it states, "No population data are available for these animals...", but further on it states, "Nongame wildlife abundance and species diversity is well below potential... overgrazing has adversely affected vegetative diversity, substantially reducing the suitability of the habitat for many species." It seems contradictory to imply nongame wildlife is below potential, attribute it to overgrazing and then say no population data are available.

On page 47, Table 2-14 states the pronghorn antelope trend is stabilized, when in fact, our population is increasing. Also on Map 2-8, no crucial winter range is assigned on the private lands along the Sweetwater River. This is wrong because for the last

several years we have been entering 200- 400 head of antelope. Also I have seen Game and Fish maps showing this private land as critical winter antelope range.

On pages 40 and 77, fall and winter livestock grazing is referred to as a detrimental practice. In our area, and I think throughout the whole Elko area, late fall and winter livestock grazing is done on private lands and as much is beyond BLM concern. If fall and winter grazing is a problem it shouldn't be blamed on livestock, but perhaps the wild horses who do spend 100% of their time on public land.

On page 54, it states "... management alternatives which might alleviate range conditions are redistribution of livestock by fencing, establishment of new water developments..." It is a shame that it has taken so many years to come to this conclusion. We have been trying for several years to get a new water well to ease the pressure on existing forage and wells; and have only this past month succeeded in wading through all the bureaucratic red-tape and prohibitions and get the well. I would suggest there are other range management practices for increasing forage and utilization which are used on private land and could lend themselves to BLM land.

On page 71 in the assumptions under socioeconomics, there are several with which I disagree. #2 says the average operator would have 54% Category I, 26% Category C, and 20% Category R; however in our area we are 100% dependent on Allotment #170J (which is Category I) for summer range. Assumption #4 states operators have the options of purchasing hay to supplement loss of AUMs or reducing herd size. Feeding hay to replace loss of summer range is not feasible because cattle need range, not hay, in the summer; and reducing herd size probably isn't feasible because of economics. A rancher has to run a certain number of cows to break even, and even if private forage is available it involves the additional expense of trucking and longer distances in looking after the stock.

On page 72, under Indirect Impacts it states, "Any losses in regional employment or revenues in the short term would be offset from the gains which could result in the long term." I feel the BLM should be especially careful to avoid any loss of employment as other jobs are no longer a readily available option for family income

Moreover, it is impossible to "offset" the loss of a family ranch.

Under Related Impacts, it states, "Wildlife species ... would be expected to increase ..." and that hunter revenues would increase. If livestock grazing is reduced to provide extra forage, it should be accompanied by equal reduction in wildlife. Allowing wildlife to increase at the expense of the ranching industry is very unfair; so is compensating ranching revenue reduction with hunting revenue increase. It might help city economies, but the rancher derives little.

Under Social Impacts it is stated there would be little change in "regional lifestyle and attitudes" and "historical pattern", because "most ranchers would continue operations much as before." If the total impact of the BLM alternatives and actions are brought to bear on one rancher it might be very difficult to "continue much as before."

On page 74 under Wild Horses, Proposed Action, it states, "present management (or lack of) would continue during monitoring." It is imperative wild horses be controlled immediately since they are constantly increasing and becoming a destructive element in the range environment. It seems that wildlife and wild horses can increase and livestock can not, and then livestock operations must bear the consequences of the situation.

On page 87 under Mitigation Measures, Wild Horses- item #2 states, "... gates could be left open to allow mixing of horse bands ..." This should never be done because of the excessive concentrations of horses which could occur to the detriment of the range. There would also be additional expense in separating and returning the horses to their proper ranges. Herd reductions are the only logical remedy for the problem. Item #3 proposes turning on and off wells to redistribute horses. What about the livestock which water at these wells? This proposal might cause undesirable distributions of livestock.

On page 103 Appendix 2 Part B table states there are 83 horses in Allotment #170J. This is inconsistent with Table 1-10 on page 17 and more especially the actual numbers on this range.

On page 107 Appendix 2 Part C table the forage demand in

Allotment #1(5) is 145.7:0. If this is figured on the incorrect season of use and species stated in Table 2-5, the demand figure will also be in error.

I would like to state that, although the main content of this letter is negative in nature, the effort of the BLM to analyse all aspects of grazing in the Elk area and the planning in the process of action over a period of time is very good. It is also a positive step to consider fencing, water development, and other forage producing techniques, rather than solely relying on livestock reduction as the means of range management. I would have liked more elaboration on the various methods of producing forage, i.e. brush burning and spraying.

In conclusion, my two basic concerns are that livestock reduction not be totally relied on to improve range conditions; and, secondly, that a long term commitment of resources must be made to carry through all proposed actions to the final goal of more forage.

Sincerely yours,

Douglas L. Thompson

Douglas L. Thompson
Myers Land and Cattle Co.

19

Green Mountain Grazing
Environmental Impact Statement

In Table 1-1, Category M allotments, I find a mistake under Allotment No. 1630 - Tree Road Allotment - it should read 17) from 04/01 to 05/15.

In Table 1-2, Category C, allotments under Allotment No. 1712 - Long Creek Investwater, it should read 75 from 11/01 to 04/30.

In Table 1-4, KMP Category I Allotments "seasons of use" should read 05/01 to 11/14.

Table 1-10, the numbers of horses in the present inventory are extremely low, whether by design or because they are simply not up to date- example, the Mountain Basin herd by the latest BLM count and related to this writer by a BLM employee is in excess of 500. The Antelope Butte herd has, by my count in one day, with no chance of counting double, at least 125 head.

Concerning many statements including the last sentence under Hydrology - Surface water- should be changed to read "...where there is heavy grazing or poor distribution of cattle and horses. . . "

It seems to this writer that to even consider the alternative "Elimination of Livestock Grazing"is an attempt to stack the deck against the livestock industry. Nowhere in the Green Mtn. Grazing draft do we find "Elimination of Wild Horses", "Elimination of Wild Life" or "Elimination of Anything" except livestock. This seems grossly unfair and I strongly object to even considering this alternative.

Since grass is a renewable resource and livestock is the only economically feasible way to utilize it, (the revenue generated by domestic livestock within the Green Mountain area exceeded $400,000 during the Year 1981) does it not seem rather ludicrous to suggest removing livestock from BLM lands?

My observation is that energy related activities and especially uranium mining on Green Mtn. has more severely affected elk habitat than all the livestock grazing that ever has or ever will occur in that area.

No mention has been made in this draft of the fact that nearly all the water is on privately owned land and that an overwhelming number of wild life water on deeded lands. Thus the wild life directly competes with domestic livestock on the livestock home ground. Also antelope during dry weather and when rangeland grasses have cured, can be found on privately owned hay fields and meadows competing with livestock during the critical growing season.

Page 2- Green Mtn. Impact Statement.

I note that wild horses eat 15,000,000 pounds of feed annually - converted to dollars, this is 7500 ton times $80 (if they were to be fed hay) would equal $600,000. Wild horses contribute not one penny toward paying for their upkeep, and deprive domestic livestock and wild life of many tons of feed.

If livestock contribute to soil erosion, then wild horses contribute more per animal because of the nature of their travel and the fact that they tend to move in herds to and from water.

Under the heading Environmental Consequences, Unavoidable, Related impacts on Page 34, I feel that the last sentence is untrue and should be deleted from the draft.

Page 47 under wild horses Par. No. 2: If gates between allotments were purposefully left open, weather and green situations would take an uneven number of horses to one or the other allotment causing an uneven useage of resources.

The numbers of antelope in allotment Nos. 1701, 1705, 1712 and especially 1704 are far and away too high and should be harvested to a higher degree so as to create a better balance between livestock and other species of wildlife.

John G. Corbett

20

Hugh Jones Realty, Inc.

September 14, 1982

BUREAU OF LAND MANAGEMENT
Lander
Office

Attention: Mr. Dale Bruhaker

Dear Mr. Bruhaker:

I still have not had time to study the Green Mountain Environmental Impact Statement. Because of the very short time that I have had a copy (about 2 months) and the very busy summer season, besides the complicated language in some of the studies, I cannot give a complete answer to this letter but just a brief reply.

My main concern is statement 1915 page 4 but I'll address each factor independently. Each answer should be considered off the cuff reactions, as without more study be my family and me, it is not a prepared statement.

Factor # 1. Considering the extreme dearth of the past two years, I have improved the range greatly in the past 7 years. I believe I can do a better job than the B.L.M. employees, because I know the range and the water conditions.

Factor # 4. Because of some fences put in by the BLM some range distribution is poor. They did not consider water sources and grass distribution. I have largely overcome this by salt distribution and adjusting to the seasons such as the cattle will go higher in the hills and farther from water in cooler weather.

The BLM and I have discussed reservoir locations by Billy Buttes and halfway up the mountain in the Jones pasture since I have owned the ranch the past 7 years. Nothing has come of it. I know of no problems on BLM Lands around wetlands as there is very little water on any of the BLM lands. The water is almost all on deeded land. Some BLM land is in very steep canyons and through watering and rotating I protect these lands as well as possible without complete fencing of them.

Item # 5. Turn out dates and seasons of use have to vary from year to year and I am in a much better position to judge this. Because of the variations in altitudes it is very hard to follow a regular 4-year rotation program. I believe you will find that I hold off turning out if necessary in the spring and utilize the pasture later in the year if possible. Some years we can easily turn out May 1

(CONTINUED)